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GREAT LENGTHS S.P.A. SOCIETÀ BENEFIT

**MODELLO OF OR ORGANIZATION, MANAGEMENT AND
CONTROL WITHIN THE MEANING OF D. LGS. No. 231/2001**

Code of Ethics

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1. Data

1.1. Ethical setting of the activity

Great Lengths S.p.A. Società Benefit (hereinafter, also just 'Company' or Great Lengths), formerly "Great Lengths Universal Hair Extensions S.p.A.", shares and undertakes to comply with the ten principles of the *United Nations Global Compact*¹, the highest values that the United Nations recommends to companies, as a summary of the most important documents shared at international level on human and labor rights, respect for the environment and the fight against corruption.

It also refuses involvement with persons who carry out illegal activities or financed with illicit capital .

The Company's activities and, in particular, its mission therefore require that relations with the outside world be based on strict compliance with laws, market rules and the inspiring principles of fair competition, while respecting the legitimate interests of its *stakeholders*.

To this end, the Company has adopted this Code of Ethics, in the belief that ethics in conducting business favors the success of an entrepreneurial activity , contributing to disseminate a corporate image of reliability, correctness and transparency of the activities carried out in pursuit of its objectives.


The Code of Ethics is a point of reference for everyday work. Professional integrity, honesty, respect for commitments are behaviors that bring trust towards the Company. The violation of these values, recognized by the community and the market, and the possible commission of incorrect actions or actions against the law damage the reputation and credibility of a company and may endanger the confidence of shareholders, investors, customers, suppliers and the people themselves. work in Society.

Compliance with the Code of Ethics and the constant application of its principles also aims to help the recipients of the same to identify potentially risky situations, relationships or behaviors that are not perfectly clear that may arise in the daily performance of activities.

Knowing the Code of Ethics in depth is therefore a duty , as it is a duty to apply it.

The Code is part of the Organization, Management and Control Model (hereinafter, also just 'Model') adopted by the Company pursuant to Legislative Decree no. 231/2001 (hereinafter, also only 'Decree') and constitutes one of the protocols aimed at preventing the commission of the crimes provided for by the Decree itself.

¹ The *Global Compact* is an international initiative in support of ten universal principles relating to human rights, labour and the environment, the fight against corruption, which has brought together companies, UN agencies, trade unions and civil society organisations. They are universally shared as they derive from: the Universal Declaration of Human Rights; the International Labour Organization Declaration on Fundamental Principles and Rights at Work; the Rio Declaration on Environment and Development; the United Nations Convention against Corruption. Starting from January 2018 , the United Nations Global Compact (UNGC) launched a new *governance* model called the "One Global Compact". The objective of the UNGC is to strengthen its commitment to support companies around the world in integrating the Ten Principles into their strategies and operations and in achieving the 17 Goals set out in the 2030 Agenda.

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1.2. The recipients of the Code of Ethics

The Company's Code of Ethics is addressed to shareholders, the administrative body, statutory auditors, supervisory body, auditors, staff at any level and without exception, collaborators, customers, suppliers, subcontractors and all of them who, directly or indirectly, permanently or temporarily, establish relationships or relationships with the Company, working for the pursuit of its objectives.

All recipients of the Code of Ethics must undertake to ensure compliance with the principles and rules of conduct set out herein. In contracts with third parties, the introduction of clauses and/or the signing of declarations is envisaged both to formalize the commitment to compliance with the Model and the Code of Ethics, and to regulate contractual sanctions, for the event of violation of this commitment.

1.3. Issue of the Code of Ethics

The issuance of the Code of Ethics by the Company is one of the tools put in place to ensure the dissemination and observance of principles, norms and general standards of conduct aimed at safeguarding the ethical values of reference.

It is therefore necessary to identify and define those values that all recipients of the Code of Ethics must share, accepting responsibilities, roles and models of conduct of acting in the name and / or on behalf of the Company itself.

The Code is valid both in Italy and abroad, although it is reasonably applied to the different cultural, political, social, economic and commercial realities of the various countries in which the Company operates or will operate.


1.4. Unethical behavior and reputation value.

Those behaviors assumed by anyone – individual or organization – on behalf of the Company, which are in violation of the rules of civil coexistence and correct social and commercial relations, as provided for and governed by laws and regulations.

In the conduct of business, unethical conduct compromises the relationship of trust and can foster hostile attitudes towards the Company.

A good reputation favours investment by shareholders, external and institutional investors, attracts the best human resources, fosters relations with commercial, entrepreneurial and financial partners, consolidates reliability towards creditors and the serenity of relations with suppliers.

1.5. Structure of the Code of Ethics

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The Code of Ethics consists of:

1. the premises, which frame the value attributed by the Company to an ethical approach to the activity;
2. the general principles, which define the ethical values of reference;
3. guidelines, norms and general standards of conduct;
4. of the Supervisory Body *ex D. Legislative decree. No. 231/2001*;
5. final implementing provisions .

2. General principles - Ethical values

2.1. Honesty, impartiality and compliance with the rules

Honesty is the ethical principle of reference for all the activities carried out by the Company for the fulfillment of its mission.

As part of their professional activity, employees, collaborators, and all persons who operate in the name and on behalf of the Company are required to comply with national and EU laws in force , regulations , internal codes and, where applicable, rules of professional ethics. Under no circumstances is conduct in violation of these rules justified or tolerated by the Company, even if it is prosecuted in the interest of the Company.

2.2. Repudiation of all forms of terrorism

The Company repudiates all forms of terrorism and intends to adopt, within the scope of its activities, appropriate measures to prevent the danger of involvement in acts of terrorism. To this end, the Company undertakes not to establish any working or commercial relationship with subjects, whether natural or legal persons, involved in acts of terrorism, as well as not to finance or otherwise facilitate any activity of these.


2.3. Responsibility in business

The Company looks after its business interest exclusively through integrity and transparency in the conduct of business.

To promote the company's activity or defend its market positions, it does not maintain relationships with parties, organizations, public or private companies based on promises, devolutions and concessions of goods.

2.4. Prevention of corruption

In the conduct of its activities, the Società prohibits any action against or by third parties, whether public or private, capable of undermining impartiality and autonomy of judgment.

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To this end, the company undertakes to implement the necessary measures to prevent and avoid both public and private corruption², as well as other conduct suitable to integrate the crimes provided for by the Decree.

In this regard, the Company does not allow to pay or accept sums of money, gifts or favors to / from third parties, even through third parties, in order to provide direct or indirect benefits to the Company; it is instead allowed to accept or offer gifts that fall within the usual uses of hospitality, courtesy and for special occasions.

2.5. Non-discrimination

In decisions that affect relations with its interlocutors, the Company does not allow any kind of discrimination based on age, sex, sexuality, state of health, race, nationality, political opinions or religious beliefs of its Interlocutors.

2.6. People

People are the great asset of the Society; Only by involving people in teamwork and sharing objectives can the Company achieve its mission.

People are an indispensable resource for the success of the company mission; therefore, they must constantly place themselves, with a spirit of service, at the disposal of the Company, to ensure the quality of the services rendered.

2.7. Business integrity and interest


Employees must, in carrying out their duties, comply with the rules laid down in the letter and the employment contract, but above all they must adapt their conduct to the company's interest.

Top management must be reference models of corporate ethical values for all employees of the company.

All staff in the exercise of their duties, at different levels of responsibility, must make decisions and carry out the activity in the exclusive corporate interest; In particular, it is necessary to:

- carry out the tasks assigned, to the best of their abilities, according to the directives given by the management or / and by the direct superiors;
- use the due diligence required by the nature of the work performed;
- refuse gifts and offers of goods even potentially capable of influencing the autonomy of judgment.

²By way of example, the crimes of corruption, bribery, undue inducement to give or promise benefits, corruption between private individuals, etc. are recalled.

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It is not allowed to belong to associations that have illicit purposes, or carry out activities in contrast with the law, morality or corporate interests.


2.8. Health and safety at work - value of human resources

In the field of health and safety at work, decisions, of all kinds and at all levels, are taken and implemented on the basis of the following fundamental principles and criteria:

- a) identify hazards ;
- b) assess work-related risks that cannot be avoided;
- c) prevent hazards at source;
- d) adapting work to man, in particular as regards the design of workstations and the choice of work equipment and working methods, in particular to alleviate monotonous work and repetitive work and to reduce the effects of such work on health;
- e) take account of the state of technical development ;
- f) replace what is dangerous with what is not dangerous or less dangerous;
- g) plan prevention, aiming at a coherent whole integrating technique, work organization, working conditions, social relations and the influence of factors in the working environment;
- h) give priority to collective protection measures over individual protection measures;
- i) give appropriate instructions to workers.

All recipients are obliged to pay attention to their own health and safety and that of other persons present at the workplace, and to contribute, within the limits of its tasks and responsibilities, to the fulfillment of the obligations provided for the protection of health and safety in the workplace, having to, in particular:

- guarantee compliance with the provisions and instructions given by the Employer and the Person in Charge, for the purposes of collective and individual protection;
- use the protective devices made available according to the instructions given by the Employer;
- appropriate use of work equipment and, in general, safety devices ;
- provide for the timely reporting of any malfunctions or incidents in the means of protection and safety devices adopted, as well as of any possible dangerous condition of which they become aware;
- participate in education and training programs organized by the Employer ;

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- undergo the health checks required by current legislation or otherwise arranged by the competent doctor.

The Company protects and promotes the value of human resources, in order to improve and increase the experience and wealth of skills possessed by each collaborator; guarantees working conditions respectful of individual dignity and environments of Safe and healthy work.

The Company supports and respects human rights, in accordance with the UN Universal Declaration of Human Rights .

The Company is committed to spreading and consolidating a culture of safety that develops an awareness of risks and promotes responsible behavior on the part of all employees; moreover, it constantly works to preserve, especially with preventive actions, the health and safety of workers also through the definition and implementation of appropriate reference standards.

In any case, the Company undertakes to comply with current local legislation on safety and health in the workplace, to this end by carrying out technical and organizational interventions, through:

- the introduction of an integrated risk and safety management system;
- a continuous analysis of the risk and criticality of the processes and resources to be protected;
- the adoption of the best technologies, right from the design of workplaces ;
- the control and updating of working methods;
- the definition and development of training and communication interventions aimed at all levels of the organization.

2.9. Fairness in relations with staff


The Company guarantees that, in the application of hierarchical rules in relations with personnel, there are no occasions in which the exercise of the principle of authority is detrimental to the dignity, professionalism and autonomy of the employee.

The Company makes its own organizational choices safeguarding the professional value of workers.

2.10. Conflicts of interest

The recipients of this Code of Ethics pursue, in the performance of their duties or functions, the objectives and general interests of the Company and therefore refrain from activities, behaviors and acts that are in any case incompatible with the obligations related to the relationship with the Company.

The Company takes appropriate measures to prevent the parties involved in the transactions from having a conflict of interest. To this end, recipients are required to inform their hierarchical superior or the person to whom they are required to report in advance of situations or activities in which they may have an interest.

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in conflict with those of the Company (or if such interests are held by close relatives) and in any other case in which there are significant reasons of convenience even if not in conflict with the Company.

The recipients are required to comply with the decisions taken in this regard by the Company.

A situation of conflict of interest exists both in the event that an employee pursues interests other than that of the company mission or personally takes advantage of business opportunities of the company, and in the event that the representatives of the *stakeholders* act in contrast to the fiduciary duties related to their position.

The Company strongly condemns the aforementioned behaviors even if they bring, even involuntarily, an interest or advantage towards the Company.

The conflict between personal interest and that of the Company arises when a behavior or a decision in the context of one's work activity can generate an immediate or deferred advantage for oneself, one's family members or acquaintances, to the detriment of the business interest.


By way of example and not exhaustively, the following activities may give rise to conflict of interest:

- Perform a top EC function (administrator, head of function, etc.) and have economic interests with suppliers, customers or competitors (ownership of shares, professional assignments, etc.);
- take care of the Company's purchases or control over the execution of supplies and carry out work activities with suppliers;
- take advantage personally - or through family members - of business opportunities of which you are brought to the attention as a representative of the Company;
- accept money, gifts (valuables, travel, gifts of various kinds) or favors (for example hiring or career advancement for family members) from persons or companies that are or intend to enter into business relationships with the Company.

The conflict of interest has a direct effect on the person involved, limiting or influencing his objectivity of judgment.

2.11. Company assets and interests of third parties

The protection of the integrity of capital, corporate assets and the interests of creditors is part of the Company's ethical tradition.

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3. Guidelines, norms and general standards of behavior.

3.1. Relations with shareholders and holders of financial instruments

The Company strives to ensure that the participation of shareholders and other holders of financial instruments in decisions within their competence is widespread and aware and that equal information is granted to all.

3.2. Corporate Bodies

The activities of the corporate bodies are based on full compliance with the rules established by the Articles of Association and by current national, community or international legislation.

3.3. Administrative bodies

Persons elected or appointed to administrative functions shall be:


- to actively engage so that the Company can benefit from their specific skills;
- continuous participation in the work of the collegiate bodies, promptly denouncing any situation of conflict of interest that sees them involved;
- the confidentiality of information acquired in the performance of its mandate;
- to always make the interest of the social mission prevail over the particular interest of the individual.

3.4. Transparency, completeness and confidentiality of information

The Company undertakes to manage the flow of information to *stakeholders* in such a way that it meets the requirements of truthfulness, completeness and accuracy, also with regard to financial, accounting or management data.

The Company also ensures the confidentiality of the information in its possession, defining and continuously updating the specific procedures for the protection of information required by current regulations regarding the processing of personal data.

All those who, in the exercise of their work functions, are found to have the availability of confidential information and data are required to use such data only for the purposes permitted by law. The *privacy* of the employee is protected through the adoption of all measures and safeguards for the processing and storage of information required by current legislation. Any investigation into the ideas, preferences, personal tastes and, in general, the private life of employees is prohibited.

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3.5. Transparency of financial statements and accounting

The Company considers the transparency of financial statements and the veracity of its contents a fundamental principle in the conduct of business. This requires that the validity, accuracy and completeness of the basic information for accounting records be deepened .

All employees engaged in producing, processing and accounting for such information are responsible, within the scope of their duties, for the transparency of the Company's accounts and financial statements.

Each accounting entry must respond exactly to what is described in the supporting documentation .

Employees who are aware of omissions, falsifications, neglect of accounting or documentation on which accounting records are based, are required to report immediately to the higher level .

3.6. Employees and collaborators

3.6.1. Personnel selection

The evaluation of the personnel to be hired is carried out on the basis of the correspondence of the candidates' profiles with respect to company needs, safeguarding equal opportunities for all subjects Interested.


The information requested is closely linked to the verification of the aspects envisaged by the professional and psycho-aptitude profile, respecting the private sphere and the opinions of the candidate.

3.6.2. Establishment of the employment relationship

The staff is hired with a formal employment contract in the manner provided for by law and collective bargaining in force.

For the establishment of the employment relationship or the collaborator must sign the relative contract as well as the commitment to comply with the provisions of the Code of Ethics; the subject is also fully informed about:

- the characteristics of the function and tasks to be performed;
- the regulatory and contributory elements of the contract;
- the regulations and procedures in use at the company, for the prevention of possible health risks deriving from work.

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3.6.3 Personnel management

The Company prohibits any form of discrimination against personnel.

As part of personnel management processes, the decisions taken are based on the correspondence between the Company's needs and the profiles of the workers as well as on considerations of merit. The same applies to access to different roles or tasks.

In the case of company reorganizations, the Company safeguards the value of human resources by providing, if necessary, training and/or professional retraining actions.

3.6.4. Collaboration and responsibility

The direct superior has the duty to provide all the information and support necessary for a correct performance of the work. Those who have managerial and / or managerial positions also have the supervision and responsibility of those who are entrusted to their leadership and are required, towards them, to behave with respect, correctness and impartiality.

All staff must operate in accordance with company policies and behave respectfully not only towards the Company, but above all towards their colleagues and other people with whom they enter into contact during the performance of their duties.

The workplace is not the place to express personal differences with other employees.

3.6.5. Reporting and documentation duties

Each employee of the Company is required to collaborate in order to ensure the correct reporting of every management event and to safeguard, according to criteria suitable for a reasonable availability, the supporting documentation of the activity carried out. This is to protect the correct and truthful representation of the economic, equity and financial results, and to guarantee that all the activities carried out are consistent with the organizational structure and the powers conferred, as well as complying with the laws and company regulations.


3.6.6. Use of company assets

Employees must respect, protect and guard the values and assets entrusted to them.

The person must use responsible behavior and respect the operating procedures prepared for the use of company assets, documenting, where required, their use.

3.7. Processing of personal data

Employees who carry out operations of collection, recording, storage, processing, dissemination, destruction, etc. of data relating to a natural person, legal entity, body or association must process such data

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respecting the right of confidentiality of the interested parties in accordance with the directives and instructions given by the managers appointed by the Company.

3.8. Respect and protection of the environment

The Company considers the environment a primary value to be safeguarded and its activities are carried out in full compliance with current environmental legislation; undertakes to contribute constructively to the protection of the environmental heritage of reference, seeking a balance between economic objectives and essential environmental needs.

It is also committed to motivating and raising awareness among all the Company's employees, promoting a positive attitude and increasing their sense of responsibility towards the environment.

Every employee involved in production processes that may have environmental repercussions must carry out his work with the utmost responsibility, checking and immediately reporting to his superior and to the control bodies any dangerous situation for the surrounding environmental matrices, such as discharges and accidental releases of hazardous substances. It is the duty of all employees to protect the environment. Anyone who becomes aware of the violation of environmental protection regulations, or of actions aimed at concealing such violations, must immediately inform his superior and in any case the competent function indicated by company procedures.

Smoking is prohibited in the workplace and in all other places or premises of the Company, except for those intended for smokers.

3.9. Suppliers, subcontractors, partners and external collaborators


The Company requires its suppliers, subcontractors, partners and external collaborators to comply with the ethical principles contained in this document.

In the choice of suppliers and subcontractors, the Company, while operating in order to achieve maximum competitive advantage, takes into account – in addition to economic convenience – also the technical / economic capacity of its contractors, evaluating their reliability as a whole, with reference to the specificity of the services to be rendered.

Relations with suppliers, subcontractors and external collaborators are always regulated (subject to the minimum amount limits established by company procedures) by specific contracts / orders, aimed at achieving maximum clarity in the discipline of the relationship.

3.10. Customers

The Company bases its activities on the criterion of quality, understood essentially as the objective of full customer satisfaction.

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

The company has recourse to litigation only when its legitimate claims do not find due satisfaction in the interlocutor.

In conducting any negotiation by the company takes appropriate measures so that the parties involved in the transactions are not or may appear to have a conflict of interest.

3.11. Public Administration

Relations between the Company and the Public Administration, in accordance with the principles enshrined in this Code of Ethics and current legislation, must be based on maximum transparency, loyalty and fairness.


The assumption of commitments with Public Administrations and Public Institutions is the responsibility of the company functions in charge and authorized.

It is not allowed, in relations with public officials and / or persons in charge of public service, any form of gift or free benefit, promised, requested, offered or received, much less indirectly, which can be interpreted as exceeding normal commercial practices or courtesy, or in any case aimed at acquiring preferential treatment in the conduct of any operation attributable to the company's activity.

It is also admitted that, on the occasion of special occasions (e.g. Christmas holidays), the Company may pay homage, according to custom, to some interlocutors, with goods of modest value, ascribable to promotional activities or acts of courtesy. The value of gifts to public officials cannot exceed that allowed by the code of conduct adopted by the individual P.A.

The Company strictly prohibits all Recipients of this Code from offering or promising, directly, indirectly, or through an intermediary: money, gifts or compensation, in any form, to promise goods, services, benefits or favors to managers, officials, employees of the Public Administration, persons in charge of public service, or to their relatives and / or cohabitants , in order to induce them to perform an act of office or contrary to the duties assigned to the Public Administration, having to be considered and such also the purpose of favoring or damaging a party in a civil, criminal or administrative process, causing a direct or indirect advantage to the Company.

Likewise, the Company strictly prohibits all Recipients of this Code from offering or promising, directly, indirectly, or through an intermediary person money, gifts or compensation, in any form, even if "induced" by the public or official or by the person in charge of public service. Acquiescing on the part of the Recipients of this Code to the requests of a public official or a public service officer who, by abusing his office, unduly induces to offer benefits of any kind for him or third parties, also configures against the subject "induced" to the offense, the crime of

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"inducement and undue to give or promise utility" (art. 319-quarter c.p.) referred to in art. 25 of Legislative Decree. 231/2001 and subsequent amendments. which follows the administrative liability provided for by the aforementioned Decree.

The Recipients of this Code who, operating in favor of the Company, receive explicit or implicit requests for benefits, of any kind, from subjects of the Public Administration, as defined above, must immediately:

- suspend all relations with them;
- inform in writing its direct manager or the Administrative Body;
- inform the Supervisory Body in writing.

The provisions set out in the preceding paragraphs must not be circumvented by recourse to various forms of aid and contributions which, in the form of assignments, advice, advertising, etc., adduce similar purposes to those prohibited by this paragraph.

The Company does not allow the Company to use or submit false statements, documents or certifying news and / or false statements, or omit the required information, to obtain contributions, loans or other disbursements, however denominated, granted by the State, by a Public Body, by the European Union or by others by International or Supranational Public Bodies.

It is therefore forbidden to mislead anyone by artifice or deception in order to procure for the Company an unfair profit to the detriment of others. The violation of this prohibition is even more serious if the State or a public body is misled.


The "unfair profit" can be direct or indirect and includes, in addition to contributions, loans and other disbursements granted by the State, by a public body, by the European Union, by other Supranational Public Bodies Financing, also concessions, authorizations, licenses or other administrative acts.

It is also forbidden to use contributions, loans or other disbursements, however denominated, granted to the Company by the aforementioned subjects, for purposes other than those for which they were assigned.

It is intended to alter in any way the functioning of a computer or telematic system or to intervene illegally in any way on the data, information and programs contained therein or pertaining to it, in order to obtain an unfair profit with others damage.

3.12. Specific duties of staff

The Administrative Body, employees or collaborators of the Company must refrain from accepting gifts or gifts exceeding normal courtesy practices, as well as from accepting, for themselves or for others, offers of benefits or benefits beyond normal commercial relations and in any case aimed at compromising independence of judgment and operational correctness. The administrator, employees and collaborators who receive gifts or

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benefits not included in the permitted cases, they are required to inform the Supervisory Body for appropriate assessments.

3.13. Use of IT or telematic tools

The use of IT or telematic tools and services assigned by the Company must take place in full compliance with current regulations on computer crimes, computer security, *privacy* and copyright and internal procedures, avoiding exposing the Company to any form of liability and/or sanction. In any case, it is forbidden for any member of the Company as well as for any person operating in the name or on behalf of the same Company to access, for any purpose or utility, without authorization and in violation of the law, to computer or telematic systems of others, as well as to violate the relative access limits. These obligations must also be complied with in relation to any access restriction to the Company's corporate computer system, where such access is the exclusive responsibility of certain subjects.

3.14. Correct information to the P.A.

In order to ensure correct information with the Public Administration, the Company undertakes to:


- operate, with fairness and impartiality, through the communication channels in charge of this, with institutional interlocutors at national and international, EU and territorial level;
- represent the interests and positions of the Company in a transparent, rigorous and consistent manner.

3.15. Antitrust, regulatory and control bodies

The Company fully and scrupulously complies with the rules issued by the Market Regulatory *Authorities*³ and/or by the Supervisory and Control Bodies.

The Company provides the Authorities and regulatory institutions with the requested information and data, taking care of its completeness and reliability. It respects deadlines and is timely in responses, within the limits set by the technical checks implied by the requests. With the Authorities and the regulatory institutions of the sector, the Company takes an approach of loyal collaboration, provides the relevant information and makes available its technical knowledge to facilitate the regulatory task, safeguarding the confidentiality of the data of third parties in its possession. However, all information must be disseminated in a manner consistent with company policies and verified with those responsible.

³ E.g., Antitrust and Privacy Guarantor

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To ensure maximum transparency, the Company and its employees /collaborators undertake not to be in situations of conflict of interest with employees of any Authority and their family members.

3.16. Contributions to organizations, foundations, parties and other associations

Any funding by organizations (non-profit, trade union, etc.) Foundations, committees, political parties and candidates or other associations, must take place in compliance with the law and regulations in force.

The payment of such loans must, however, be authorized by the functions responsible for managing such relationships within the Company.

The Company may adhere to requests for contributions, within the limit of proposals from organizations or associations, intended for initiatives of cultural, sports, charity, social and humanitarian value.


3.17. Conduct towards the judicial authority

All recipients of the Ethical Code (in consideration of the different obligations and positions that each assumes towards the Company) are prohibited from engaging in conduct that may fall within the types of crime referred to in Article 25-h of Legislative Decree 231/2001 ("*Induction not to make statements or to make false statements to the judicial authority*").

In particular, the recipients must comply with the following general principles of conduct:

- prohibition to induce anyone, through violence or threat or through the offer or promise of money or other benefits, not to make statements or to make false statements to the Judicial Authority or to make use of the right not to respond, in order to favor the interests of the Company or to otherwise benefit the same;
- provide effective collaboration and make truthful and exhaustively representative statements of the facts in relations with the Judicial Authority;
- the addressees (suspect / defendant, person informed of the facts / witness or witness assisted / accused in a related criminal proceeding) called to make statements before the Judicial Authority regarding the activity are required to freely express their representation of the facts or to exercise the right not to respond granted by law; They are also required to maintain the utmost confidentiality with regard to the statements made and their subject, where they are covered by investigative secrecy.

All Recipients must promptly notify their direct Manager – who will inform the Administrative Body – and the Supervisory Body, of any summons to testify and of

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any criminal proceedings involving them, in any respect, in relation to the work performed or in any case related to it.

4. Supervisory Body ex D. Lgs. 231/01

4.1. Powers

The Supervisory Body ('SB'), established according to the dictates of Legislative Decree no. 231/2001 and subsequent amendments, has the task of supervising compliance, adequacy and updating of the Model, as well as compliance with the ethical principles and waived in this Code.

To this end, it carries out checks on the functioning and compliance with the Model and is free to access all the Company's sources of information; it has the right to view documents and consult data; it proposes to the competent bodies any updates to the Model and the internal protocols that are part of it.

The Supervisory Body operates with wide discretion and with the complete collaboration of the Company's top management and structure .

4.2. Reports

All Recipients of the Company's Code of Ethics are required to provide maximum collaboration to the SB, promptly transmitting the requested information and documents and providing any further assistance.


That said, all Recipients are required to immediately notify the SB of any circumstance likely to constitute a violation of the Model and/or the protocols that constitute it, including the Code of Ethics.

The following information, news and data must also be communicated to the SB, for which the office / internal function responsible is also indicated:

Subject of the communication	Responsible	Periodicity
1) promises, requests or offers of money, gifts or other undue benefits from or intended for public officials or public service agents, including the Company's resources	All Recipients	No delay

(2) omissions or falsifications in the keeping or keeping of accounts	All Recipients	No delay
3) the measures and/or information coming from judicial police bodies or from any other authority from which it emerges that investigations are carried out that affect, even indirectly, the Company or the Recipients	All Recipients	No delay
(4) infringement of internal procedures concerning the selection of suppliers or contractors	All Recipients	No delay
5) ongoing disciplinary proceedings and their conclusive measures	HR Manager	Annual
6) news related to organizational changes	HR Manager	No delay
7) updates of the system of powers and delegations, as well as of the internal procedures in force	Administrative Manager	No delay

8) decisions on the application, disbursement and use of public funding/relief/subsidies	HR Manager	Annual
9) contracts/agreements stipulated with Public Bodies or performing a public service, as well as public tenders in which the Company has participated	Administrative Manager	Annual
10) the results of the checks and inspections conducted by the PA	Board.	Annual
11) the annual financial statements approved by the shareholders' meeting	Board.	Annual
12) accidents lasting more than 20 days	RSPP	Without delay
13) the summary table of the "near misses" reported with indication of the outcome	Head of Management System	Semiannual
14) the minutes of periodic meetings pursuant to art. 35 D.Lgs. 81/2008	RSPP	Annual
15) the minutes of the Management review pursuant to BSOHSAS 18001:07	Head of Management System	Annual

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16) Evidence Cards	Internal managers	Semiannual
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Recipients may send information, data, documents and reports, even anonymously regarding possible violations of the Model, in writing by *e-mail* to the *odv@greatlengths.com* address, reserved for the Supervisory Body .

In any case, the Supervisory Body must ensure that the person making the communication/report, if identified or identifiable, is not subject to retaliation, discrimination or, in any case, penalization, thus ensuring confidentiality (except for the recurrence of any legal obligations that impose otherwise).

4.3. Reports in the light of the " whistleblowing" legislation

The Company has adopted an internal system for reporting violations in light of the introduction of Law no . 30 November 2017, no. 179 (law on the c.d. "Whistleblowing").


Whistleblowing is a tool aimed at strengthening the safeguards of legality and transparency, which helps to control and prevent even more effectively the risks that the Company may face in the face of the commission of facts and actions contrary to the law, the Model, the Code of Ethics or company procedures, helping to implement the Company's social responsibility policy and promoting its integrity and correctness.

Each employee is required to actively collaborate in the achievement of high ethical standards, both directly, respecting the provisions that see him addressed, and indirectly, by reporting any violations of laws, provisions of the Model and procedures that could have a negative impact on the Company, its customers, employees and the community in general.

According to the Whistleblowing procedure adopted by the Company, staff may make reports in good faith, in relation to negligent, illegal, irregular or incorrect circumstances and conduct concerning the work activity, of which they have become aware during the performance of their duties.

In particular, alerts must contain:

- elements useful for the reconstruction of the reported fact, with the indication, where possible, of relative supporting documentation ;
- information that allows, where possible, the identification of the person responsible for the reported event;

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- an indication of the circumstances in which the reported event became apparent.

The Company guarantees the protection of any reporting party against any form of retaliation, discrimination or penalization, whether direct or indirect.

Furthermore, the confidentiality of the report received and the identity of the whistleblower is guaranteed, which can be disclosed only in cases where there is a request from the Judicial Authority, as part of investigations undertaken in relation to the fact subject of the report.

5. Implementing and final provisions

5.1. Adherence to the provisions of the Code

A copy of this Code will be delivered by all Company personnel, who will be asked to sign a letter of commitment to comply with the provisions of this Code and the requirements of the Model as well as to participate in training and information programs.

For new hires, the commitment to comply with the Code of Ethics and the requirements of the Model adopted by the Company will be formalized directly in the letter/contract of employment.


To external subjects such as suppliers, subcontractors, partners and external collaborators, etc., the commitment to respect the ethical principles of reference contained in this document will be formalized by signing a specific supplementary contractual clause.

5.2. Consequences of violation of the Code

The violation of the provisions contained in this Code constitutes a disciplinary offense and, as regards external collaborators, suppliers, customers and partners, contractual, and as such may be sanctioned in proportion to the seriousness of the non-fulfillment or *fait accompli*, after contesting the facts, without prejudice, for employees, to compliance with the procedures referred to in Article 7 of Law no. 300 of 20 May 1970 (so-called Workers' Statute), collective labour agreements and any company regulations adopted by the Company.

5.3. Training activities

The provisions contained in this Code, in addition to being brought to the attention of all personnel, will be the subject, as a whole and / or for specific sections of in-depth analysis, of autonomous training initiatives.

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5.4. Revision and updating of the Code

Notwithstanding that it is the responsibility of the Administrative Body to adopt any necessary amendments and/or additions to this Code, the Supervisory Body shall monitor, modify and supplement the provisions contained in this Code, submitting the proposals to the attention of the Administrative Body for the Approval required.

5.5. Dissemination and knowledge of the Code

In order to fully implement and disseminate the corporate ethical principles contained in the Code of Ethics and the requirements of the Model, in collaboration with the Supervisory Body, specific training/information programs will be planned and organized, appropriately differentiated according to the role and organizational responsibilities of the participants.

The Company publishes the document on its website.