



A R S E N A L E

### **Organisational Model 231 and Code of Ethics**

Arsenale Express SpA (the "Company") informs that, in accordance with the **Legislative Decree of 8<sup>th</sup> June 2001, no. 231**, has adopted an **Organisational, Management and Control Model (MOG)** and a **Code of Ethics**, essential tools to ensure integrity, legality and transparency of carrying out business activities.

The **MOG** has been introduced to prevent offences by apical or subordinate parties in the interest of or for the benefit of the Company and to protect assets, reputation and all stakeholders. The **Code of Ethics**, an integral part of the MOG, is the foundation of the company's values, promoting ethical behaviour, which complies with the current regulation in every business relationship. Both documents, approved by the Board of Directors, reflect the Company's commitment to operate in line with the best governance practices.

The Code of Ethics can be consulted at the following [link](#).

A **Supervisory Body (OdV)**, an independent multi-staff body with autonomous powers of initiative and control, has been established to oversee the application of the MOG and the Code of Ethics. The OdV ensures that the principles and procedures of the Model are effectively implemented, verifying their knowledge and suitability to prevent non-compliant behaviour.

### **Whistleblowing and protection of the informer**

The Company is committed to promote a culture marked by integrity, ethics and transparency and in this regard **recalls** that the dedicated **reporting channels** are active, established in accordance with the **Legislative Decree no. 231/2001**, the **Law of 30<sup>th</sup> November 2017, no. 179** and the **Legislative Decree of 10<sup>th</sup> March 2023, no. 24**, which transposes the Directive (EU) 2019/1937.

These channels allow employees, collaborators, suppliers and third parties to report, even anonymously, any illegal behaviour including violations of the MOG and/or the Code of Ethics.

It is possible to make reports through the dedicated channel accessible at the following [link](#).

- <https://whistleblowersoftware.com/secure/ArsenaleExpress>
- <https://whistleblowersoftware.com/secure/ArsenaleGroup>

Reports are treated with strict **confidentiality**, in accordance with the regulation on the protection of personal data (**EU Regulation 2016/679 - GDPR**). The Company ensures that the data provided is used exclusively for the analysis and management of reports, ensuring the protection of the informer against any form of retaliation, discrimination or punishment.

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