ORGANISATION, MANAGEMENT AND CONTROL MODEL

(pursuant to Legislative Decree no. 231/2001, as subsequently amended and integrated)

Annex 4

Penalty system

BREVETTI CEA S.P.A.

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1 OVERVIEW

One of the essential elements for the construction, implementation and maintenance of an effective Organisation, Management and Control Model pursuant to Art. 6 of Legislative Decree no. 231/01, is the existence of an adequate *Penalty System* suitable to punish any failure to comply with the measures mentioned in the Model (internal protocols/procedures provided for by the Model, Code of Conduct, circulars and service orders, etc.).

As a consequence, the definition of an adequate penalty system is an essential prerequisite for the Organisation, Management and Control Model to relieve the company of the administrative liability of corporations *as per* Legislative Decree no. 231/2001.

Given the seriousness of the consequences for the Company in the event of illicit conduct by employees in general, managers, directors and auditors, any failure to comply with the Model constitutes a breach of the duties of diligence and loyalty and, in the most serious cases, harms the relationship of trust established with the Company.
Breaches of the Organisational Model and of the Code of Conduct will result in the application of the disciplinary sanctions set out below, regardless of any potential criminal liability or the outcome of related legal proceedings; as for the rules set forth in this System, they do not replace but rather complement the provisions of law and the clauses included in the national collective agreement regarding disciplinary sanctions.
The existence of a disciplinary system for employees – who can be classified as "persons subject to the direction or supervision" of one or more senior figures according to Art. 5, Paragraph 1, letter b) of Legislative Decree no. 231/01 – is inherent to the employment relationship, as provided for by civil law regulations[1]. In particular, the lawmaker explicitly stated that employees have a duty of diligence and loyalty in carrying out their job, and the employer can resort to the application of disciplinary sanctions in the event of any conduct that is not consistent with such obligations. The sanction must be proportional to the seriousness of the infringement committed and comply with the provisions contained in Workers' Statute[2], current National Labour Collective Agreement for the mechanical industry, the National Labour Collective Agreement for industrial managers and, in general, in the laws in force.
In accordance with the law in force, the disciplinary sanctions applicable to Company's employees must be brought to the attention of all the persons to whom the provisions included therein apply, even through publication on company's notice board or by any other means deemed suitable.

Pursuant to the provisions in question, therefore, this Penalty System applies to Company's employees and non-employees.

2 PERSONS THE PENALTY SYSTEM APPLIES TO

The provisions of this document, as well as those of the Code of Conduct and Model 231 in general, apply, to the extent respectively applicable, to the following individuals (hereinafter, the "**Persons Concerned**"):

[1] Articles 2086, 2094, 2106 of the Italian Civil Code
[2] Art.7 of law no. 300/70

- *In-house Persons* (hereinafter also referred to as "*Personnel*"): those who have an ongoing relationship, either fixed-term or open-ended, with the Company; for example, members of the corporate bodies, employees, contract staff (including semi-subordinate workers), interns and trainees;
- *External Persons* (hereinafter also referred to as *Third Parties*"): external professionals, partners, suppliers and consultants, employment agencies and, in general, those who, due to their relationships with the Company, when carrying out any activities in the name and/or on behalf of BREVETTI CEA, or in any case, when carrying out their activities for the Company, are exposed to the risk of committing any of the offences provided for by Legislative Decree no. 231/2001 in the interest or to the advantage of the Company.

The Company: (a) brings the Model to the attention of its employees, using the most appropriate tools, and (b) adequately informs the employees of its contents, and trains them accordingly.

3 CONDUCTS THAT RESULT IN A BREACH OF THE MODEL

To ensure that the prohibited behaviours are readily understood, the following is a list of the main punishable breaches:

a) breach of the prohibitions and obligations specifically mentioned in the Code of Conduct;

b) failure to cooperate with the Supervisory Body or its operational staff, through omissions or reticent behaviours, or in any case through behaviours preventing or even just obstructing its control, investigation and verification functions;

c) breach or circumvention of the operating procedures and protocols adopted by the Company;

d) failure to supervise or inadequate supervision by hierarchical superiors over the compliance with the provisions and procedures set out in the Code of Conduct and/or in the Model by employees;

e) commission, even attempted, of acts regarded by the law as offences that may result in the liability of the Company pursuant to the Decree;

f) commission of actions or behaviours that do not comply with the provisions of the Model, or omission of actions or behaviours required by the Model, when performing any sensitive or instrumental activities that:
    1. expose the Company to an objective situation of risk of committing one of the offences provided for by Legislative Decree 231/2001, as subsequently integrated; and/or
    2. are unequivocally aimed to commit one or more offences provided for by Legislative Decree 231/2001, as subsequently integrated; and/or
    3. result in the application to the company of the sanctions provided for by the Legislative Decree no. 231/2001, as subsequently integrated.

g) breach of the measures protecting the person reporting any illicit conduct relevant to Legislative Decree no. 231/2001 or any breaches of Model 231;

h) malicious or grossly negligent reporting of any unfounded illicit conduct relevant to Legislative Decree no. 231/2001, or of any breaches of Model 231;

i) in the event that a sanction or precautionary interdiction measure has been applied to the Company, breach of the obligations or prohibitions related to such sanctions or measures;

j) failure to participate in training programs implemented by the Company in relation to the subject in question without adequate justification.

m) with particular reference to the offences related to health and safety at work and to the environment:
   - failure to comply with, implement and monitor, or breach of the regulations for the protection of health and safety at work (Legislative Decree 81/08, as subsequently amended);
   - failure to comply with, implement and monitor, or breach of environmental protection regulations (Legislative Decree 152/2006, Italian Criminal Code and other special regulations).

It should be pointed out that the aforementioned behaviours are regarded as infringements punishable under this document even if they are committed through omissions and/or possibly in collusion with other individuals.

4 APPLICATION PROCEDURES

4.1 Procedures against employees

Upon notification of a potential Model breach, an investigation procedure will be initiated, followed, where appropriate, by the disciplinary procedure established by law and by the applicable National Labour Collective Agreement. As a consequence:

i) each report of a Model breach triggers the investigation procedure; in particular, the Manager of the function to which the employee in question belongs and/or the Human Resources Manager, proceed with all necessary investigations, with the broadest powers to acquire all useful information, also resorting to the technical support of the relevant company structures; if the breach has been reported, pursuant to Art. 6 of Legislative Decree no. 231/01 the person who received it must protect whistleblower's identity confidentiality;
ii) in the event that, following the procedure, the Model is actually found to have been breached, a charge must be notified and, taking into account any justifications that the worker deems appropriate to submit within the terms established by current legislation, a disciplinary sanction may be applied.

More specifically:

- upon being informed of a potential breach by the subjects who have a coordination and/or verification function, and having heard the hierarchical superior of the perpetrator of the

conduct in question, the Company formally notifies the charge and - after having analysed any justifications from the employee - imposes the applicable disciplinary sanction;
- the Supervisory Body is notified of the application of the disciplinary sanction;
- the adoption of discriminatory measures against the whistleblowers may be reported to the National Labour Inspectorate, for the measures falling within its competence, not only by the whistleblower himself/herself, but also by the trade union organisation indicated by them;
- the retaliatory or discriminatory dismissal of the whistleblower is null and void, as is any change of duties in violation of Article 2103 of the Italian Civil Code. In the event of any disputes related to the application of disciplinary sanctions, or to demotions, dismissals, transfers, or to the application to the whistleblower of other organisational measures negatively affecting, whether directly or indirectly, working conditions, following the submission of the report, the employer shall be responsible for proving that such measures are based on reasons unrelated to the report itself.

The Company monitors the application of disciplinary sanctions and verifies the compliance with all legal and contractual obligations related to their application.

4.2 Procedures against Directors, members of the Board of Statutory Auditors and General Managers appointed by the Shareholders' Meeting

This Model is given to each member of the Board of Directors and of the Board of Auditors, as well as to the General Managers appointed by the Shareholder's Meeting.
When the breach of the provisions and rules of conduct of the Model and of the Code of Conduct is committed by any members of the Board of Directors or of the Board of Statutory Auditors, or by a General Manager, the Supervisory Body, or any other person who has become aware of it, in accordance with the powers held and with the company procedures, must promptly inform the entire Board of Directors and the entire Board of Statutory Auditors of the incident, as well as the Supervisory Body, if the information does not come from the latter.
The Board of Directors and the Board of Statutory Auditors, each within the scope of their own powers or functions or prerogatives, may take, as provided for by law or by the Articles of Association, any appropriate measures, including the immediate or timely call of the Shareholders' Meeting.
The Shareholders' Meeting shall examine the facts which are the subject-matter of the non-compliance in the agenda, formally state the alleged facts which caused the meeting to be called, specifying the time and place of the non-compliance in question, and also set the date of the subsequent meeting, during which they will examine the oral and/or written defences of the offender, and then take the appropriate measures.
The notification of the charge to the offender, as formalised, may be delegated to the Chairman of the Board of Statutory Auditors, if it concerns a Director, or to a member of the Board of Directors, if it concerns a member of the Board of Statutory Auditors or a General Manager, who will take care of the communication by registered letter with return receipt, specifying the date of the next Meeting called for the above-mentioned purposes.
At least twenty-five days and no more than forty days must elapse between the date of reception of the notification and the date set for the Meeting.
Upon formalising the charge, if it deems that there are any particularly serious breaches, the Meeting may order that until the conclusion of the proceedings the offender is

temporarily suspended, effective immediately; such measure will be communicated to the offender along with the charge.

In the event that the offender is a company's employee, all the sanctions provided for in Paragraphs **7.1** and **7.2** may also be applied to them.

The outcome of the investigations carried out and any disciplinary sanctions applied must be communicated by the Chairman of the Board of Directors to the Supervisory Body and to the person/company in charge of the statutory audit if there are any well-founded indications of a corporate crisis that may undermine business continuity.

If the breach has been reported, pursuant to Art. 6 of Legislative Decree no. 231/01 the person who received the report must guarantee that whistleblower's identity remains confidential.

4.3 PROCEDURES AGAINST THE AUDITOR/AUDITING FIRM

The contract with the Auditor/Auditing Firm must include a specific clause requiring the undertaking of obligations related to the compliance with the preventive protocols and with the provisions of the relevant Model 231, with regard to the existing relation and to the relevant sanctions applied in the event of a breach.
When any infringements are found by the Auditing Firm, following a report from the Supervisory Body or another person or on its own initiative, the Board of Directors shall evaluate the application of the sanctions mentioned at **points a. and b.** of Paragraph **7.4**, or urgently convenes a Shareholders' Meeting in accordance with the Articles of Association and in compliance with the Italian Civil Code, for the possible sanction mentioned at **point c** of Paragraph **7.4**.
The Board of Directors or the Shareholders' Meeting, according to their respective competences, shall examine the facts which are the subject-matter of the non-compliance in the agenda, formally state the alleged facts which caused the meeting to be called, specifying the time and place of the non-compliance in question, and also set the date of the subsequent meeting, during which they will examine the oral and/or written defences of the offender, and then take the appropriate measures.
The decisions taken must be communicated to the Supervisory Body.
The notification of the accusation to the offender, as formalised, may be delegated to a member of the Board of Directors, who will take care of the communication by registered letter with return receipt or certified email, specifying the date of the next Meeting called for the above-mentioned purposes.
At least twenty-five days and no more than forty days must elapse between the date of reception of the notification and the date set for the meeting.
If the breach has been reported, pursuant to Art. 6 of Legislative Decree no. 231/01 the person who received the report must protect whistleblower's identity confidentiality.

4.3 Procedures against third parties (e.g., business partners, consultants and external collaborators)

When entering into contracts for - by way of example only - supply, procurement of goods and/or services, consultancy, agency, distribution or commercial representation assignments, specific clauses will be drawn up, by which the third party - in the relations

with the Company - undertakes to respect the principles and operating practices defined in the Model and/or in the Code of Conduct, as well as to adopt, to the extent of its competence, any company procedures, and/or to maintain a conduct that is suitable to prevent the commission of the offences provided for by the Decree. Any failure to comply with these obligations, as it would be a serious and essential breach, will give the Company the right to apply the following sanctions, which must be expressly provided for in the contract:

- reminder and order to comply;
- suspension of contract execution and simultaneous notification of a mandatory deadline by which the effects of the alleged breach must be fully remedied, under penalty of an ipso iure termination of the contract itself;
- payment of a penalty in the amount that will be deemed appropriate and effective for the different types of relations established with the third parties;
- immediate termination of the contract pursuant to Art. 1456 of the Italian Civil Code, without prejudice to the third party's obligation to compensate the Company for damage.

In the event of a breach by collaborators, consultants or other third parties linked to the company by a contractual relationship other than employment, the Supervisory Body or any other person who has become aware of it, in accordance with the powers held and the company procedures, reports this circumstance to the Managing Director of the Area to which the contractual relationship pertains.

The aforementioned Director will proceed with all necessary investigations, with the broadest powers to acquire all useful elements - also resorting to the support of the competent company structures - and will take the appropriate initiatives, pursuing the applicable contractual remedies, subsequently informing the Board of Directors.

The infringement must be formally notified in writing by registered mail with return receipt to the offending party, specifying the facts that gave rise to it, as well as the time and place.

No sanctions can be applied unless the infringement has been previously notified in writing, specifying the fact that gave rise to it and, in any case, if fifteen days have not elapsed since the notification itself, during which the third party must be heard, if he/she requests it, and will have the right to submit his/her own defence, even in writing.

The application of the above-described sanction must be reasoned and communicated in writing to the domicile of the offending third party by registered mail with return receipt.

The outcome of the investigations carried out and any initiatives taken against the Third Parties must be communicated by the Managing Directors to the Supervisory Body and to the person/firm in charge of the statutory auditing, if there are any well-founded indications of a corporate crisis that may undermine business continuity.

If the breach has been reported, pursuant to Art. 6 of Legislative Decree no. 231/01 the person who received the report must protect whistleblower’s identity confidentiality.

5 EVALUATION CRITERIA FOR THE CONDUCTS CHARGED TO EMPLOYEES

The type and extent of each of the sanctions listed below, even in application of the principle of proportionality pursuant to Art. 2106 of the Italian Civil Code, may vary according:

- to the intentionality of the behaviour or of the degree of negligence, imprudence or incompetence, also taking into account the foreseeability of the event;
- to the overall conduct of the worker, with particular regard to the existence or absence of any prior disciplinary actions against the person, within the limits permitted by law;
- to the worker's duties;

- to the functional position of the persons involved in the facts that gave rise to the fault;
- to any particular aggravating or mitigating circumstances associated with the disciplinary offence;
- to any shared liability with other employees who contributed to cause the fault;
- to company's exposure to the risk of commission of offences and to the possible application of the sanctions provided for by Legislative Decree no. 231/01.

In any case, the Company reserves the right to demand compensation for any damages arising from the Model breach by an employee.
With regard to the identification of infringements, the disciplinary proceedings and the application of sanctions, the powers already granted to Company's managers, within the limits of their respective delegations and competences, shall remain valid.

6 ROLE OF THE SUPERVISORY BODY

Supervision of the compliance with the Model is the responsibility of the Supervisory Body which, in the exercise of its functions, is also required to find any breaches.
Any found infringements must be reported to the Supervisory Body.
Once the infringements have been found, directly or following the reception of any reports, the Supervisory Body shall investigate the causes, any corrective actions undertaken and any options to resolve the negative effects of the infringement, as well as anything that might be useful to prevent the risk of commission of a predicate offence.
The Supervisory Body will also examine any anonymous reports, and for them too will carry out, if possible - and in any case within the limits of its competence - the appropriate investigation, to verify whether they are well-founded or not.
Following its investigations, if the fact is considered well-founded and punishable, the Supervisory Body will send the documentation, along with a written opinion, to the Director of Human Resources or to the Board of Auditors, if the infringement was committed by a Director. The Supervisory Body may provide suggestions regarding the actions to be taken, without prejudice to the fact that competence for their adoption solely lies with the Company.

7 SANCTIONS

7.1 Sanctions against non-managerial employees

Company's penalty system is based on the relevant provisions set forth in Italian Civil Code, Workers' Statute, industry-specific National Labour Collective Agreement and, in any case, in applicable legislation on the matter concerned.

The sanctions applicable to non-managerial employees are those provided for by law and by the regulations set forth in applicable National Labour Collective Agreements, namely:

1. verbal reproach/reprimand;
2. written reproach/warning;
3. fine up to an amount equal to 3 hours of remuneration, calculated referring to the base pay; in addition to cases of repeat offences in the commission of infringements which may result in the application of a written reprimand, the fine may be applied

in cases where, due to the level of hierarchical or technical responsibility, or to the presence of aggravating circumstances, the culpable and/or negligent behaviour may undermine, even just potentially, the appropriate and effective implementation of the Model;
4. suspension from work and pay for up to 3 days;
5. dismissal with notice;
6. dismissal without notice.

The system, as also provided for by the relevant National Labour Collective Agreements, provides examples of the punishable behaviours sorted according to the importance of individual cases, listing the applicable sanctions according to their severity.

Without prejudice to the need to evaluate the type and extent of the sanctions in accordance with the criteria listed in Paragraph 5, in addition to the examples provided by the relevant National Labour Collective Agreement and as an example of the general principle (Art. 2104 of the Italian Civil Code), according to which employees have the obligation to observe the duties of office in the most scrupulous manner, it should be pointed out that a worker commits a disciplinary offence if he/she, even in collaboration with others:

- breaches the internal procedures set out in this Model by his/her actions or omissions,
- tolerates, even if ordered to do so by a hierarchical superior, the breach, by other persons, of the internal procedures contained in the following model; orders and/or induces colleagues of equal or higher rank and/or subordinates to breach the internal procedures of this model and/or to tolerate the breach of such procedures
- adopts, when carrying out any activities in areas at risk, a behaviour that does not comply with the provisions of this Model, through actions and/or omissions, whether or not it is such as to result in the actual application of any of the measures provided for by the Decree against the company
- adopts, through actions or omissions, a behaviour aimed to commit an offence provided for by Legislative Decree no. 231/2001; adopts, through actions or omissions, a behaviour which constitutes an offence provided for by Legislative Decree no. 231/2001; violates the measures aimed to protect the person reporting any unlawful conduct relevant to Legislative Decree no. 231/2001 or any breaches of Model 231;
- reports with intent or gross negligence any unlawful conduct relevant to Legislative Decree 231/2001 or any breaches of Model 231 which have turned out to be unfounded.

The selection of the actual penalties to be applied in relation to the commission of one or more of the conducts exemplified above will be carried out in application of the principle of proportionality pursuant to Art. 2106 of the Italian Civil Code, as well as of the criteria mentioned in Paragraph 5 above.

7.2 Sanctions against managers

When the breach of the internal procedures provided for by the Model and/or the Code of Conduct is committed by managers, the most appropriate sanction will be applied to the offenders, in accordance with law provisions, the regulations established by the industry collective agreement or by any individual agreements, up to the termination of employment.

In such cases, furthermore, any powers of attorney granted to the manager may be revoked, if necessary. and, where possible, the manager may be assigned to a different role.

Disciplinary sanctions, as well as any claim for damage, shall be proportional to the level of responsibility, to the role and the strength of the fiduciary bond related to the corresponding assignment.
In the event of a breach by managers, the Supervisory Body – or another person who has become aware of it in accordance with his/her powers and with the company procedures – reports this circumstance, as provided for in Paragraph 6 above, to the Human Resources Manager and, for information or in the event that the alleged offender is the Human Resources Manager, to the Board of Directors. If the breach has been reported, pursuant to Art. 6 of Legislative Decree no. 231/01 the person who received the report must protect whistleblower's identity confidentiality. The aforementioned Human Resources Manager (or any other delegated person) carries out all necessary investigations, with the broadest powers to acquire all useful information, and takes the appropriate initiatives.
The outcome of the investigations carried out and any disciplinary sanctions applied must be communicated to the Supervisory Body.

7.3 Sanctions against Directors and Auditors and against general managers appointed by Shareholders' Meeting

If the offender is a member of the Board of Directors, the following sanctions may be applied (as detailed in the Paragraph 9 Table):

- formal written warning that censures the breach of the Model and/or of the Code of Conduct and order to comply with the provisions of the Model and/or the Code of Conduct,
- the suspension from office and remuneration for a period ranging between one and six months,
- the revocation of any delegation in the exercise of which the breach was committed and, in the most serious cases, the revocation of the assignment for just cause,

The sanctions provided for if the person is a member of the Board of Statutory Auditors, instead, are the following:

- formal written warning that censures the breach of the Model and/or of the Code of Conduct and order to comply with the provisions of the Model and/or the Code of Conduct,
- the suspension from office and remuneration for a period ranging between one and six months,
- removal from office, subject to approval by decree of the Court pursuant to art. 2400, Paragraph. 2 of the Italian Civil Code.

Sanctions and any claims for damage shall be proportional to the level of responsibility, the role and the strength of the fiduciary bond related to the corresponding assignment.

In the event that the Director is a company employee, all sanctions provided for in Paragraphs 7.1 and 7.2 above may also be applied to them.

The provisions of point 7.3. regarding the sanctions against Directors and Auditors shall apply to the General Manager appointed by Shareholders' Meeting.
The outcome of the investigations carried out and any disciplinary sanctions applied must be communicated to the Supervisory Body by the Chairman of the Board of Directors.

If the breach has been reported, pursuant to Art. 6 of Legislative Decree no. 231/01 the person who received the report must protect whistleblower's identity confidentiality.

7.4 Sanctions against the Auditor/Auditing Firm

Applicable sanctions are the following:
a. formal written warning that censures the breach of the Model and/or of the Code of Conduct and order to comply;
b. payment of a penalty provided for by a specific contractual clause;
c. dismissal from office for just cause, after hearing the Board of Auditors, without prejudice to the communications referred to in Art. 13, Paragraph 7 of Legislative Decree no. 39/2010.

Sanctions may be applied in the event of obstruction of Supervisory Body's supervisory activity , as well as in the event of a breach of the prevention protocols and of the provisions of the Model and/or the Code of Conduct applicable to the Auditing Firm, for the relevant parts.
The sanctions mentioned at points a. and b. will be applied by the Board of Directors.
The sanction mentioned at point c. will be applied by Shareholders' Meeting.
In any case, the Shareholders' meeting shall comply with the provisions of the Special Law.

7.5 Measures against third parties (e.g. business partners, consultants and external collaborators)

In the event that an offence provided for by the Decree, or in any case a breach of the Model and/or the Code of Conduct, is committed by Third Parties (e.g., business partners, consultants and external collaborators of the Company itself, however named, or by other persons having contractual relations with the Company), this will be punished as provided for in the specific contractual clauses included in the relevant contracts.

7.6 Sanction file

The Company keeps an up-to-date sanction file maintained by the Human Resources Manager.
Sanctions applied to members of the Board of Directors or third parties having a relation with the company will be recorded in a file kept by the Supervisory Body.

8 CHANGES TO THE PENALTY SYSTEM

All changes to this Penalty System must be adopted by the Board of Directors, after obtaining Supervisory Body's non-binding opinion, unless the changes involved are not substantial, i.e., are not liable to affect the suitability and preventive effectiveness of the Model (for example, the modification of references to contractual provisions on disciplinary matters).

The changes must be brought to the attention of all the persons to whom the provisions contained therein apply, even through publication on the company notice board or by any other means deemed suitable.

9 QUESTIONABLE CONDUCT OF TOP MANAGERS AND SANCTIONS

In compliance with the principle of legal certainty and in order to ensure that the prohibited behaviours are readily understood, the following is a list of the main disciplinary breaches for the top managers, as defined by Art. 5, Paragraph 1, letter a) of Legislative Decree no. 231/2001[3]:

Types of top management conduct	**Sanctions**
- Failure to comply with the protocols and procedures for the scheduling of the decision-making by the Administrative Body (Managing Directors and members of the Board of Directors) in the activities of the function	- Reminder and order to comply - Suspension if the infringements are serious and repeated - Revocation if repeated after suspension
- Failure to comply with the procedures and/or processes for the implementation of the decisions of the Governing Body in organisational activities	- Reminder and order to comply - Suspension if the infringements are serious and repeated - Revocation if repeated after suspension - Termination of employment if repeated after revocation
- Failure to comply with the methods and procedures laid down for the acquisition and management of the financial resources set aside for the prevention of any underlying offences	- Reminder and order to comply - Suspension if the infringements are serious and repeated - Revocation if repeated after suspension - Termination of employment if repeated after revocation
- Failure to comply with the obligation to document the stages provided for by procedures and protocols in the functions and processes at risk of commission of a predicate offence	- Reminder and order to comply - Suspension if the infringements are serious and repeated
- Behaviours that obstruct or circumvent the Supervisory Body's controls, unjustified denial of access to information and documentation for the persons in charge of the controls	- Reminder and order to comply - Suspension if the infringements are serious and repeated - Revocation if repeated after suspension
- Failure to comply with, implement and control, or breach of the provisions on	- Reminder and order to comply - Suspension

[3] Legislative Decree no. 231/2001, Article 5 - Responsibility of the entity: *"1. The entity is responsible for the offences committed in its interest or to its advantage: a) by persons who represent, administer or manage the entity or an organisational unit of it having financial and functional autonomy, as well as by persons who are responsible, even in fact, for its management and control; […]"*

health and safety at work of Legislative Decree no. 81/08, as subsequently amended, which may result in the commission of specific negligent predicate offences provided for by Articles 589 and 590, Paragraphs 2 and 3, of the Italian Criminal Code.	- Revocation in the most serious cases, in the event that the underlying offence is actually committed - Termination of employment if repeated after revocation
- Failure to comply with, implement and control, or breach of environmental protection regulations (Legislative Decree no. 152/2006, Italian Criminal Code and other special regulations) which may result in the commission of predicate offences provided for by Art. 25 undecies of Legislative Decree no. 231/2001.	- Reminder and order to comply - Suspension - Revocation in the most serious cases, in the event that the underlying offence is actually committed - Termination of employment if repeated after revocation
- Breaches of the specific obligation to supervise subordinates	- Reminder and order to comply - Suspension - Revocation in the most serious cases, in the event that the underlying offence is actually committed
- Multiple unjustified and repeated violations of the Model protocols and of its implementation for ongoing adaptation	- Suspension - Revocation if reiteration continues after suspension - Termination of employment if repeated after revocation
- Failure to report any non-compliances and irregularities, even committed by senior managers	- Reminder and order to comply - Suspension if the infringements are repeated
- Failure to make evaluations and take timely action regarding reports and reminders for actions pointed out by the Supervisory Body in the activities under the responsibility of senior managers	- Reminder and order to comply - Suspension if the infringements are serious and repeated - Revocation if reiteration continues after suspension