



Galstaff Multiresine S.p.A. has always operated with a strong focus on respecting current Italian and European legislation, international *best practices* and principles of legality, loyalty, and fairness. This commitment is evident in the Company's dedication to complying with regulations and conducting business according to transparent behavioral standards.

The Company considers the culture of "legality" a value to be promoted internally, believing that adopting an Organization, Management, and Control Model is an effective tool to raise awareness. This helps ensuring that, in carrying out their activities, employees and partners adopt correct and straightforward behaviors, thereby preventing the risk of committing any type of crime, especially those outlined in Decree 231/2001.

Galstaff Multiresine S.p.A. has implemented its own Organization, Management, and Control Model in accordance with the requirements of Legislative Decree 231/2001 and in line with the applicable regulatory framework. The model is based on principles already embedded in the Company's governance culture and takes into account the guidelines provided by Confindustria.

The purpose of the Model is to establish a structured and comprehensive system composed of procedures and control activities (both preventive and *ex post*) aimed primarily at reducing the risk of committing Predicate Offenses. This is achieved through mapping "Risk Areas" and proceduralizing the activities involved, making the entire system "integrated" with existing certified quality management systems within the Company.

The principles contained in this Model aim to achieve two main objectives: first, to foster full awareness among potential offenders that committing an illicit act is strongly condemned and contrary to the Company's interests—even when the Company might seemingly benefit; second, to prevent and promptly react to any criminal activity through ongoing monitoring of operations.

The effective implementation of the Model makes the Company's governing bodies, employees, consultants, and all partners operating on behalf of or in the interest of the Company aware that non-compliance with the Ethical Code and the Model could lead to criminal offenses, with potential legal consequences not only for themselves but also for the Company.

The Company is committed to actively repressing any illicit behavior, including through the constant activity of the Supervisory Body overseeing all stakeholders' actions. Disciplinary sanctions and contractual clauses ensuring compliance with the system are part of this effort.

Galstaff Multiresine S.p.A. has therefore decided to adopt this Organization, Management, and Control Model with the following goals:

- To further promote awareness of proper and transparent management of the Company, respecting current laws and fundamental ethical principles in business conduct;

- To reaffirm that any illicit behavior is strongly condemned by the Company, as it violates legal provisions and the ethical principles the Company upholds and intends to adhere to in its operations;
- To enable continuous control and vigilant oversight of activities, allowing timely intervention in risk situations and the application of disciplinary measures where necessary;
- To instill in all those acting on behalf of the Company the awareness that committing offenses outlined in the Decree can lead to criminal sanctions for the offender and administrative sanctions for the Company.

The key elements of Galstaff Multiresine S.p.A.'s Model include:

- Identification of business activities where relevant crimes could be committed (sensitive activity mapping – risk assessment);
- Establishment of control principles related to identified sensitive activities;
- Operational procedures governing main business activities and processes that might be at risk;
- A management control system highlighting critical situations;
- A communication and training system for staff and corporate bodies to ensure widespread and effective dissemination of Company policies and procedures;
- A disciplinary system to sanction violations of the Model's provisions;
- Appointment of an Autonomous Supervisory Body with independent powers of initiative and control, tasked with overseeing the functioning and proper application of the Model;
- Specific reporting obligations to the Supervisory Body regarding key events affecting Company activities, especially in risk areas.