CODE OF ETHICS AND CONDUCT

TOP GLASS INDUSTRIES S.p.a.

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CHAPTER I

GENERAL PRINCIPLES

Art. 1: COMPANY PROFILE

Top Glass Industries S.p.a. (hereinafter "Top Glass" or the "Company"), founded in Milan (Italy) in 1963, is a company specializing in the production of fiberglass composites and the manufacture and sale of machinery in the industry.

The Company operates at its legal headquarters, currently located in Brescia, Via Montesuello, No. 18, and at its operational site in Osnago (LC), Via dei Soldani, No. 3 (tel. 039 952231).

The Company's e-mail address is info@topglass.it and the website is www.topglass.com.

Art. 2: PREAMBLE

A) Nature and purpose of the Code

This Code of Ethics and Conduct (hereinafter also the "Code"), approved by the Shareholders' Assembly, defines and regulates the Company's *Policy* and brings together the ethical principles and rules of conduct in which the Company is reflected, defining the general discipline to which all those who work in the corporate environment and for the Company are subject.

Top Glass aims to develop its activities in compliance with principles of fairness, honesty, and respect toward all *stakeholders*.

B) Prescriptive content

The Code assigns legal relevance and mandatory effect to the ethical principles and behavioral standards described herein. Awareness of and adherence to the Code's prescriptions are prerequisites for establishing and maintaining collaborative relationships between the Company, its personnel, and third parties, towards whom Top Glass undertakes to disseminate all related information, in a context of absolute transparency.

Violation of the principles set forth in the Code compromises the relationship of trust between the Company and the (internal or external) offending collaborators, and is pursued incisively, promptly and immediately, through appropriate and proportionate disciplinary and/or sanctioning procedures, regardless of the possible significance

criminal prosecution of the conduct engaged in and/or by the institution of criminal proceedings if a crime occurs.

C) Recipients

The recipients of this Code, and therefore the parties required to comply with the principles set forth herein, incorporating them into their daily business conduct, are:

a) Top management, i.e., corporate bodies (the Board of Directors, delegated bodies, Directors, the Board of Statutory Auditors, as well as any individual who exercises, even de facto, powers of representation, decision-making and/or control within the Company)

b) Subordinate personnel, i.e., the Company's employees;

c) parasubordinate and independent collaborators, such as agents, consultants, business partners, as well as suppliers and subcontractors of goods and services.

All these individuals, who act directly or indirectly in the interest of the Company, regardless of the nature of their relationship with it, are hereinafter also referred to as the "Recipients."

Art. 3: IMPLEMENTATION OF THE CODE

A) Adoption and entry into force

The Code comes into effect on the date of its approval by the Company's Shareholders' Assembly.

B) Internal and External Dissemination

This Code is being:

I. shared within the Company by delivering copies of the same to members, corporate bodies and employees;

II. Publicly disclosed to consultants and suppliers via the Company's website (www.topglass.com).

Copies of this Code will always be available for inspection at the secretary's office of the Corporate Office.

C) Updates

The Code is subject to amendments, integrations, and updates, which may be approved by the Shareholders' Assembly at any time. Updates will be promptly communicated to all subjects bound by it.

D) Interpretation

Any conflicts of interpretation between the principles and contents of the Company's procedures and the Code shall be deemed to be favorably resolved in favor of the latter.

In any case, the Administrative Body takes care of the definition of any issues about the interpretative and applicative aspects of the Code.

This Code supersedes and fully replaces any previous equivalent document.

E) Supervision and detection of violations

The function of supervising the observance and operation of the Code is the responsibility of the Supervisory Board (hereinafter also "OdV") established pursuant to Art. 6 of D.lgs. 231/2001.

The Supervisory Body, based on internal or third-party reports (including anonymous ones, as per the whistleblowing system referred to in Chapter V), identifies and verifies any violations and reports them to the appropriate bodies.

The designated Body charges them to the offenders, and imposes on them the sanctions provided for in the adopted Disciplinary System, identifying them according to the type of offenders and the seriousness of the violation, after the possible involvement of the Corporate Bodies.

F) Sanctions

Recipients falling under categories sub a) and b) of art. 2, lett. c) who fail to comply with the provisions of the Code are liable to internal disciplinary sanctions, imposed with procedures and measures in accordance with the Statuto dei Lavoratori and the Contratti Collettivi Nazionali Lavoro applied.

In the context of relations with personnel, any violation constitutes a breach of contract, resulting in the application of disciplinary sanctions, given the mandatory nature of the Code, pursuant to and for the purposes of Articles 2104 Codice Civile (*diligence of the employee*) and 2105 Codice Civile (*duty of loyalty*).

As for recipients under letter c), the violation may substantiate an express termination cause of the contractual relationship. Provision is also made for the inclusion of an express termination clause pursuant to Article 1456 of the Codice Civile in the contract of assignment in the event of violation by the above-mentioned subjects (collaborators, suppliers, subcontractors and assimilated) of this Code of Ethics.

The Company undertakes to provide for and impose, with consistency, impartiality and uniformity, sanctions proportionate to violations of the Code and in accordance with the current provisions on the regulation of labor relations.

CHAPTER II

BUSINESS ETHICS

Art. 4: VALUE PRINCIPLES

Top Glass inspires its choices, as well as the related actions, to the ethical and value principles recalled below, which configure its corporate *policy* and serve as a guiding framework for the behavior of the Recipients of the Code of Ethics.

A) Fairness, honesty and legality

The Company ensures that all individuals operating within its organization adhere to the principles of fairness and loyalty in the performance of their internal and external duties, with the goal of safeguarding the Company's image and the relationship of trust established with third parties.

Therefore, executives, employees, para-subordinate staff and all collaborators, business partners or suppliers of the Company are required to act fairly and honestly in carrying out their duties, avoiding illegal or illegitimate objectives or situations that could create conflicts of interest in order to obtain undue advantages for themselves, the Company, or third parties.

Under no circumstances may the interest or advantage of the Company induce and/or justify behavior that is not compliant with the law. All Recipients are therefore required to act in accordance with applicable laws and regulations, the Code of Ethics, the adopted Organizational Model, and corporate rules

B) Information

In accordance with the principle of transparency, the Company is committed to providing accurate, truthful, and complete information about its products, services, and, in general, any data requested by third-party stakeholders (clients, suppliers, creditors, users, partners, etc.), without prejudice to compliance with the Privacy Law.

C) Impartiality and independence. Hierarchical principle

The Company works to ensure that all of its members act impartially and fairly, not only in the performance of their duties, but also in intercompany relations and with various stakeholders.

The activities performed by the staff are entrusted and taken care of with the necessary independence, depending on the type of activity required and its delicacy, difficulty and particularity.

The Company's organization conforms to the hierarchical principle according to which individual members, based on their levels of placement in the corporate organizational chart and on the basis of their assigned duties, are competent and responsible for their actions and omissions. In this way, individuals who hold management and representative positions in the company, including at the departmental or function level, will exercise direction, coordination and control over the activities of the individuals subordinate to them and coordinated by them, for whose actions they will be accountable according to applicable regulations.

D) Fairness, equality and protection of individuals

Top Glass condemns any form of discrimination and abuse, both in internal and external relations.

It ensures that none of the recipients of the Code engage in discrimination based on cultural background, health conditions, political or religious beliefs, cognitive or physical differences, psychological conditions, disabilities, age, ethnicity, gender, sexual or emotional orientation, geographical origin/nationality, or lifestyle, and it implements measures to prevent any form of exclusion.

In compliance with legal regulations protecting physical and moral integrity, the Company ensures that its personnel have decent working conditions in safe and healthy working environments.

Top Glass considers its personnel an indispensable asset in the Company's success. For this reason, the Company protects and promotes the value of its employees, collaborators and anyone working in its name or on its behalf, with the aim of maximizing their degree of satisfaction and increasing the wealth of skills they possess.

Likewise, Top Glass repudiates all forms of infringement of individual rights and human dignity, exploitation of labor.

E) Diligence and professionalism

The Company works to ensure that personnel perform their duties with the necessary diligence and accuracy, in compliance with the directives given by hierarchical superiors and managers and, in general, with the company's quality standards.

Personnel or individuals entrusted with certain services by the Company possess proven skills, professionalism, and experience.

The Company expects everyone to demonstrate availability, flexibility and humility to meet deadlines and to continually propose innovations and improvements at all levels, encouraging dialogue with colleagues.

F) Quality of services and products

Top Glass is deeply committed to customer satisfaction, both current and prospective, addressing their needs and expectations by offering competitive products and services in its field, with maximum professionalism, flexibility, and high quality standards.

Top Glass aims to achieve business success through constantly improving the quality standard of its products and services and making the related business conditions more and more competitive.

The company has complied with international technical regulations on Quality and Environment.

An internal Quality Manager operates in the Company.

G) Fair competition

In accordance with national and EU Antitrust laws, the Company does not engage in conduct or enter into agreements with other companies that may negatively affect the competitive environment in its market.

H) Confidentiality and Privacy Protection

Top Glass pays special attention to the implementation of the requirements regarding the protection and safeguarding of personal data of third parties processed by computer and other systems, as set forth in the GDPR, D.lgs. No. 196/2003 as amended by D.lgs. 101/2018 and EU Reg 2016/679, as well as the measures rendered by the National Data Protection Supervisor and the European Data Protection Committee (formerly WP art. 29).

It operates in accordance with the provisions of the personal data protection Code, Testo Unico, D.lgs. 196 of June 30, 2003 as amended by D.lgs. 101/2018 and EU Reg 2016/679.

The Company ensures the confidentiality of the information in its possession and refrains from seeking confidential data, except in the case of express and conscious authorization in accordance with applicable legal regulations, both national and EU. Top Glass employees are required not to use confidential information for purposes unrelated to the performance of their work duties.

The Company respects the rights of data subjects—whether employees, collaborators, or third parties—by providing complete and updated information on the processing of

their personal and, if applicable, sensitive data, and seeks their consent when required, solely for the purposes for which the data are collected.

In compliance with current legislation, the Company ensures that the processing of personal data—especially sensitive and judicial data—is carried out with appropriate, legally required security measures.

I) Proper use of IT and electronic system

Personnel in either managerial or subordinate roles are strictly prohibited from tampering in any way with the functioning of IT and telematic systems, or from illegally interfering—by any means—with equipment, data, information, and software used within the Company, in order to gain, directly or indirectly, a benefit or advantage for themselves, third parties, or the Company.

L) Environmental Protection

The Company promotes awareness and responsibility in environmental protection by managing its activities in an eco-compatible manner, in compliance with national and EU environmental regulations, both at its headquarters and in any location where it conducts its business.

The Company is constantly committed to the protection of the Environment as well as the protection of human health. The fulfillment of this commitment is indeed a paramount objective and is the responsibility of every person involved in its activities.

The Company carries out its statutory activities in full compliance with current regulations protecting the Environment, carrying out a constant balancing act between its business needs and environmental protection requirements.

M) Health and Safety

In carrying out its business, the Company ensures full compliance with the relevant regulations and D.lgs. No. 81/2008 on health and safety in the workplace, also adhering to best practices within its production sector.

It is the aim of Top Glass to provide people with a working environment free from any health and safety risk, to ensure that the corporate structure applies appropriate measures in this regard in accordance with relevant laws and regulations and to train and raise awareness of occupational safety among workers.

All directors, managers, employees and contractors must follow safety regulations and must report any health or safety concerns to their immediate supervisor.

In managing occupational health and safety, Top Glass is guided by the following basic principles and criteria:

- Assess risks and take action to minimize them;
- Adapt work to people, especially in the design of workplaces and the choice of work equipment and working and production methods;
- Take into account the degree to which technologies are evolving;
- implement prevention, aiming at a coherent complex of interventions that integrate technique, conditions, work organization, respect for social relations and environmental factors;
- Train and inform workers of the risks associated with the company's activities as defined in the risk assessment document and prescribed by current regulations;
- Give appropriate instructions to workers.

With this approach, and to ensure the highest level of safety, workers are required to:

- Contribute to the fulfillment of obligations provided for the protection of health and safety in the workplace;
- Observe the provisions and instructions given, for the purpose of collective and individual protection;
- Do not engage in acts or actions outside the directions given in the conduct of the activity or in the adoption of equipment and safety devices and safeguards;
- Observe existing internal procedures;
- Participate in training and education programs organized by the company;
- Undergo health checks required by current regulations or otherwise ordered by the Company’s appointed physician.

CHAPTER III

BEHAVIORAL CRITERIA

Art. 5: CORPORATE GOVERNANCE

The Company considers an adequate and effective control environment to be a fundamental element of its organization, as a complex of tools, processes and bodies necessary and useful for directing, managing and verifying business operations, with a view to efficient and ethical business operation.

A) Administrative Body

The Administrative Body, as a collegial body or delegated body, performs its functions with professionalism, autonomy, independence and responsibility towards the Company, Shareholders, Corporate Creditors and Third Parties, adopting professional diligence pursuant to Art. 1176, 2nd paragraph, Codice Civile. In case of delegation of powers, the delegating body and the delegated body operate in accordance with their respective duties, in accordance with Article 2475 Codice Civile.

Each manager, within the scope of his or her responsibilities, is required to be involved in and facilitate the operation of the company's control system and to make employees aware of it.

Directors are obliged to refrain from engaging in any collateral activities, which may harm the interests of the Company, or from pursuing their own interests or those of third parties even if only potentially conflicting and prejudicial to the Company by complying with the requirements of Article 2475-ter Codice Civile.

In addition to its own competencies, the Administrative Body, both in its collegial configuration and by its individual members, is committed to scrupulously enforcing the values set forth in this Code and in the behavioral protocols, promoting their sharing and dissemination.

B) Board of Auditors

The members of the Board of Statutory Auditors carry out their functions with impartiality, autonomy, and independence, in order to ensure effective control and continuous monitoring of the Company's economic and financial situation, supervising compliance with the law and the articles of association, observance of the principles of proper administration, and the adequacy of the organizational, administrative, and accounting structure adopted by the Company and its actual operation. The members shall comply in the performance of their duties, with the diligence pursuant to Article 1176, Paragraph 2, Codice Civile.

The Board also pays special attention to reporting and coordination among the various internal and external corporate bodies.

C) Conflict of interest

Where the Personnel or collaborators of the Company other than the Corporate Bodies, find themselves in hypothesis of potential conflict of interest, direct or indirect, without prejudice to the application of the legal rules provided for this purpose, they are obliged to promptly inform their hierarchical superior.

Art. 6: ACCOUNTING AND FINANCIAL MANAGEMENT

A) Accounting records

The accurate and truthful representation of the Company's economic, financial, and asset results is safeguarded in compliance with civil and tax regulations, to ensure transparency and timely verification.

The Company, therefore, maintains adequate supporting documentation of its activities so as to:

- Make the accounting record itself easy;
- Allow reconstruction of different levels of responsibility;
- Ensure traceability and reconstruction at all times of the operation in order to reduce the likelihood of interpretation errors.

Each accounting entry made shall correspond to the supporting documentation and shall still be kept and ordered by the Company in such a way as to ensure its easy identification and control at all times. The Company shall prevent the creation of false, incomplete or misleading records and shall ensure that no secret or unrecorded funds are established, or funds deposited in personal accounts, or invoices issued for non-existent services.

It is strictly forbidden, particularly for directors, general managers, statutory auditors, and accountants, to record untrue facts in the company’s books or accounting records, or to omit legally required information concerning the Company’s financial, asset, and economic situation, in order to mislead recipients or cause economic damage to shareholders or creditors.

To this end, applying the principle of control through task separation, individual accounting operations and their supervision and auditing must be performed by different individuals with clearly defined responsibilities, so as to avoid the concentration of unlimited or excessive powers.

Likewise, any action or omission capable of preventing, hindering or distorting control activities reserved to shareholders or attributed to corporate control bodies, as well as to the Authorities, is prohibited.

B) Internal Controls

The coordinated system of internal controls contributes to the improvement of management efficiency and is a valuable tool to support managerial action. Top Glass is committed to spreading a culture characterized by awareness of the existence and mentality oriented towards the exercise of control. Internal controls are defined as all the tools and procedures necessary and/or useful to direct, manage and verify the Company's activities in order to ensure compliance with laws and company procedures.

Management staff are obliged to be transparent and informative to the Board of Auditors and those who exercise accounting control.

Employees and Collaborators, including external ones, must provide, at the legal deadlines or upon simple request, all necessary or useful assistance and cooperation to supervisory bodies and the Administrative Body to represent the progress of corporate operations, as well as enable those responsible to carry out final accounting audits on the Company's operations during the reference period.

C) Corporate Communications

Corporate communications must be truthful, clear, correct, transparent, comprehensive, and timely. They must be made in accordance with the principles, criteria and formalities set forth in the Codice Civile, accounting principles and in compliance with the requirements of tax regulations, as well as applicable special laws and regulations.

The financial statements, whether annual or interim, the corporate and accounting books and, in general, the reports or communications on the economic, asset and financial situation required by law, are documents prepared in accordance with the principles of transparency and fairness, in line with the provisions of the relevant laws in force.

In particular, proper exercise of corporate communications is indispensable to enable the Board of Statutory Auditors to exercise its legal functions of supervision over the corporate organization, the internal control system, its actual operation and the legality of the management body's actions.

D) Financial activity

Management, staff, and collaborators must not be implicated or involved, even as an accomplice, in operations that may substantiate the laundering of proceeds from criminal or, in general, illicit activities.

Art. 7: PERSONNEL POLICY

A) Staff Selection and Recruitment

The Company pays special attention to the selection and hiring of its employees and collaborators, ensuring respect for the values of equal opportunity and equality in line with the relevant legal requirements, the Statuto dei Lavoratori and CCNL.

In particular, personnel selection activities are carried out solely on the basis of the candidates' profiles in relation to the company's contingent needs, in the utmost transparency, avoiding any form of favoritism, nepotism and discrimination.

B) Relationship management

The labor relations that the Company establishes are informed by principles of mutual respect, fair treatment and meritocracy. In this regard, the Company opposes any form of favoritism, nepotism or discrimination.

Top Glass believes that the principle of impartiality should inspire not only the initial stages of personnel selection and recruitment but, more generally, the entire sequence of business relationships and therefore promotes a personnel management policy aimed at preventing any discrimination or abuse of employees

Any initiative regarding employees, such as, for example, assignment of positions or roles, promotion, transfer, must be taken solely on the basis of the professional profile as well as the actual competence and ability of the individual employee.

Personnel are bound by the obligation of loyalty to the Company by not being able to take up employment in the employ of third parties, or collaborations not previously authorized, and not being able, in any case, to carry out activities contrary to the interests of the Company or incompatible with official duties.

Documents, working tools, equipment, facilities, and any other tangible and intangible assets (including intellectual property rights and trademarks) owned by the Company are used exclusively and instrumentally for the fulfillment of the institutional purposes, in the manner established by the Company; they may not be used by collaborators for personal purposes, nor may they be transferred or made available to third parties, and they must be used and cared for with the same diligence as one's own property.

These requirements also apply to collaborators, including external collaborators, such as *outsourcers*, project collaborators, consultants, seasonal or part-time collaborators, suppliers and subcontractors.

Top Glass understands that only a careful policy aimed at developing both the aptitudes and professional aspirations of each employee can guarantee the company the necessary dedication and optimal performance of employees.

The Company, therefore, aims to ensure adequate professional training for its employees that takes into account both their professional aptitudes and human characteristics.

C) Prohibition on offering/accepting gifts and/or other benefits

The Personnel of the Company and its Collaborators are not authorized to offer, accept or promise to anyone (public or private), for themselves or for others, any form of gift, compensation, and other gratuities or services, of any kind, including those not of an economic nature, to influence or obtain favorable treatment during the performance of their duties.

If, despite this prohibition, an employee or collaborator receives gifts, promises, or other benefits from third parties, he/she must promptly inform their direct supervisor.

D) Protection of dignity and integrity

The Company is committed to ensuring the protection of the dignity and psycho-physical integrity of all its members, in accordance with the principles of equal opportunity and protection of personal privacy, with special regard to the disabled.

It has taken all necessary measures to ensure safe and healthy working conditions, as well as safety procedures aimed at constantly improving the working environment (e.g., avoiding harassment, bullying, etc.), as well as preventing any kind of discriminatory differentiation, harassment or *bullying* action.

E) Workplace safety

Top Glass is scrupulous in complying with the occupational safety and hygiene regulations set forth in D.lgs. No. 81/2008, as well as in promoting their application in the Company, directly or indirectly. In particular, the Company carries out constant monitoring of its plant and machinery, wherever located and operating, beyond legal obligations and prevention of imminent risks, to ensure maximum safety and quality of its services.

To this end, a Risk Prevention and Protection Service Manager has been appointed, whose directives all individuals working in the Company must follow.

The Company is also required to comply with industry safety regulations.

F) Employee Duties

Employees of the Company are required to:

- refrain from any situation of actual or potential conflict of interest between the company's business and personal and/or family activities, or otherwise such that could interfere with the serenity and impartiality of its operational and decision-making sphere;
- maintain the strictest confidentiality of all information acquired in the course of its business activities, and avoid using or disseminating it, whether inside or outside the Company, except in accordance with and in compliance with Company regulations and procedures;
- perform their services with diligence, efficiency, fairness and honesty, making the best use of the time made available to them and in a responsible and diligent manner of company assets, with particular regard to those entrusted to them personally for the performance of the specific company activity. Employees, in particular, assuming the responsibilities related to the fulfillments required by their role, shall refrain from illicit uses of assets and in any case such as to compromise their efficiency, to be potentially harmful or in conflict with the interest of the Company;
- Do not take alcohol or drugs during the work shift;
- To orient the use of IT tools to social and not personal purposes;
- business tools provided by the Company shall be used in a manner consistent with the purposes for which they have been entrusted, shall be prohibited from use in the event of suspension from work (unless expressly authorized), and shall be returned immediately upon receipt of a letter of dismissal or otherwise upon termination of employment;
- To imbue the relationship with colleagues with values of civil coexistence and respect, avoiding all forms of discrimination;
- Keep environmentally friendly behavior in daily life;
- Promptly inform their direct supervisor about situations found to be contrary to the law, this Code and internal company procedures/practices.

Where such situations involve the direct supervisor(s), the employee will directly contact the head of the Office.

Art. 8: RELATIONS WITH PUBLIC ADMINISTRATION AND OTHER AUTHORITIES

The Company's relationships with Public Officials, Public Service Officers, Public Employees, and Concessionaires are based on transparency, loyalty and fairness.

The Administrative Body of the Company is committed to ensuring that the establishment and maintenance of economic-legal relations with entities that are part of the P.A. is carried out in compliance with the law and the rules of good faith and fairness.

Relations with representatives of public institutions are limited to the functions in charge and duly authorized, in compliance with the strictest observance of legal and regulatory provisions, and cannot in any way compromise the integrity and reputation of the Company.

To this end, it is forbidden for anyone working within Top Glass or on its behalf to make or consent to donations or promises of money, goods or other benefits of any kind (or promises of them) to members of the Public Administration. These requirements cannot be circumvented by resorting to forms of contributions that, in the guise of sponsorships, assignments, consultancy, advertising, etc., have, in fact, the same unlawful purposes as those prohibited above.

Acts of courtesy, gifts and forms of hospitality to public officials or public service officers may not be distributed outside the scope of corporate practice, in deference to the regulations and control principals adopted by the Company.

Similarly, managers, employees and collaborators may not receive gifts or other benefits, except within the limits of normal courteous relations and provided they are of modest value.

If a manager, employee, collaborator or other representative of the Company receives gifts in excess of the above limits, he/she shall immediately make restitution.

Relationships with institutions or public entities must be maintained exclusively by company personnel with appropriate powers of representation and/or expenditure, or by other personnel (both employees and consultants) who are expressly delegated/charged by them, in accordance with clear and transparent methods, object and purposes.

Art. 9: EXTERNAL RELATIONS

Relationships with Third Parties are managed according to principles of maximum cooperation, helpfulness, professionalism and transparency, respecting confidentiality in order to lay the foundations for a solid and lasting relationship of mutual trust and satisfaction.

A) Relationships with Suppliers and Consultants

The selection of suppliers of goods and services is based on careful technical-economic evaluation.

In the force of ongoing supply relationships, as well as with any potential supplier, the Company maintains relationships hinged on the principles of good faith and transparency and by respect for the values of fairness, impartiality, loyalty and equal opportunity.

The Company's relationships with various external consultants, collaborators and possible *outsourcers* are based on the same principles and selective criteria.

B) Relationships with Partners and Outsourcers

The Company, in carrying out its business activities for the benefit of its Clients, may make use of the cooperation of Third Parties, suppliers of goods and services, (e.g. *partners, outsourcers*, sub-contractors, associates, etc.) who operate, within the limits of the required activity, on the basis of a formal assignment, according to the conditions, terms and conditions stipulated therein, as well as under the directives and control of the Company.

The Third Party's activities must be carried out in compliance with the behavioral norms set forth in this Code and the principles of the Organization Management and Control Model adopted by Top Glass.

CHAPTER IV

ADMINISTRATIVE RESPONSIBILITY UNDER LEGISLATIVE DECREE 231/2001

Art. 12: PREVENTION OF CORPORATE OFFENCES

Top Glass Industries Spa has adopted its own organizational model in line with the provisions of D.lgs. 231/2001. At the same time, it has established in compliance with Article 6 of D.lgs. 231/2001 a Supervisory Board (OdV) to oversee the effectiveness and implementation of the Model itself, as well as this Code of Ethics.

CHAPTER V

WHISTLEBLOWING

Art. 13: THE REPORTING OF ILLEGAL ACTIVITIES

Top Glass has adopted a Whistleblowing system, which it intends to provide to employees or any other individuals involved in company activities (who wish to report a wrongdoing, anomaly or abuse or behavior that is discriminatory or not in line with the provisions of Chapter II of the company's ethics):

- Clear operational guidance about the subject, content, recipients and mode of transmission of reports;
- guarantees of protection offered to them by our legal system.

In order to handle the reports and carry out the necessary investigations into the reported facts, Top Glass has an ad hoc IT channel.

The body receiving the reports is characterized by autonomy and independence with respect to the business reality in which the reported violations are perpetrated.

The latter is under an obligation to keep the identity of whistleblowers confidential and not to use the information received outside of its investigative purposes.

CHAPTER VI

FINAL NORM

Art. 14 REFERENCE

The contents of this Code must be systematically coordinated with the provisions of the Codice Civile, with the ordinary and special laws in force, and with the Articles of Association.