

BeDimensional S.p.A. CODE OF ETHICS

DECEMBER 2018

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1. Introduction

This code of ethics has been developed to ensure that the fundamental values of BeDimensional S.p.A., which are ethic and transparency, are clearly defined and constitute the key element of the corporate culture, as well as being standards of behavior for all the Company's Collaborators in the



conduct of business and their activities, also in order to prevent crimes pursuant to Legislative Decree 231/2001.

The progressive change in the scenarios in which companies move, forces them to adapt their organization in order to improve performance through the decentralization of responsibilities, the attribution of greater operating autonomy and the specialization of professional skills.

These changes require a strengthening of the governance system in its broadest sense: integrity, ethical values, personal competence, management philosophy and style of management, procedures for delegating responsibilities, organization and professional development, commitment, Board of Directors' ability to address and guide.

In fact, the governance system becomes truly effective if a strong drive towards collaboration is achieved among all the interested parties in order to achieve the company objectives, but without ever losing sight of the ethical principles to which an entity, public or private, must always be inspired.

2. Mission and Ethical vision

The main goal recognized and pursued by the Company is the creation of value for the shareholders, to which strategies and operational management are oriented.

The Company intends to maintain and develop the relationship of trust with its stakeholders and pursue its objectives by seeking the best reconciliation of the interests involved, respecting all the legal requirements and principles of honesty, impartiality, reliability, loyalty, fairness, transparency and good faith.

3. Field of Application

Bedimensional has decided to adopt this Code of Ethics to reiterate that compliance for ethical and moral principles is a condition and guarantee for the development of the Company itself, in respect of all those who, in various ways, come into contact with the company, its structures and all of its employees.

The Code of Ethics therefore represents the backbone of the Company's business, which everyone must follow in their daily operations and in the performance of the tasks for which they are responsible, with the understanding that only full compliance with the Code can allow the Company to maintain and increase its credibility and appreciation in the various contexts in which it operates, with the conviction that business activity can and must be carried out in harmony its social value.

The provisions contained in the Code of Ethics shall apply to all employees of the Company, without any exception, to all those who directly or indirectly establish relationships with Bedimensional S.p.A., permanently or even temporarily, to the directors, collaborators, consultants and anyone who works in the name and on behalf of the Company, undertaking to disseminate the Code of Ethics, to correctly interpret its contents and providing tools in support of its application.

In fact, these individuals, each within the scope of their own responsibilities, in accordance with the principles of sound and prudent management and in compliance with national and EU laws, as well as policies, plans, regulations, and internal procedures, must contribute to the corporate mission; they must, in particular, take care of the minimization of risks and costs for the provision of the service; the safeguarding of business activities in proposing investments, in carrying out projects and in any decision or action that conditions the management of the Company; managers must follow



the same principles in implementing the will of the management. And this in the best interest of partners, customers and employees.

Those in positions of responsibility are required to be examples for their employees, in order to guide them to comply with the Code and to encourage compliance with the regulations in general. Anyone who becomes aware of any violations of the ethical principles contained in this document must notify the Supervisory Organ or, if none, the Board of Directors or equivalent authority/role that has undertaken them.

The Code of Ethics should be seen as a tool susceptible to changes and additions based on external and/or internal changes in the company, in order to ensure consistency between what is stated and the conduct.

4. Referential Ethical Principles

Bedimensional S.p.A. intends to define referential ethical principles in line with those contained in the "charter of company values", drawn up by the European Institute for the social balance, as well as with the Code of Conduct developed by the Graphene Flagship to which the Company is associated. Such principles represent the fundamental values to which the Addressees must adhere in the pursuit of the mission statement and, in general, in the conduct of social activities.

Bedimensional has therefore chosen, along with all the shareholders, to commit itself into adopting responsible behavior in terms of internal and external relations and applying all the initiatives that contribute to promoting a conscious Corporate Social Responsibility.

Bedimensional is therefore aware that ethic is an intangible asset, constituting value and condition of success for the company. For this, under no circumstances will the conviction of acting for the benefit of Bedimensional S.p.A. justifies behavior in contrast with the principles of this Code, to which must be recognized primary and absolute value.

Responsibility and compliance with the laws

Bedimensional S.p.A. has as its fundamental principle the respect of the laws and, in general, regulations in force in Italy and in all the countries with which it operates, as well as the democratic order established there, restricting any illegal practice in the forms of conduct that even indirectly integrate elements of collaboration with criminal associations however named.

Any act of a corrupt nature in any form is expressly prohibited, so under no circumstances it is permitted to pursue or achieve the interest of the Company by violating the law.

This principle must be considered operative both for what concerns the activities carried out in the Italian territory and those linked to the relationships with international operators.

Fairness

The principle of fairness implies respect for the rights of all parties involved in the Company's activities. In particular, the Recipients must act correctly in order to avoid situations of conflict of interest, by which they are generally defined as all the situations in which the pursuit of their own interests is in conflict with the interests and mission of the Company. In addition, situations must be avoided whereby an employee, director or other Recipient may derive an advantage and / or a profit unduly from opportunities known during and due to the performance of his activity.

Impartiality

Bedimensional S.p.A. disregards and repudiates any principle of discrimination based on sex,

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nationality, religion, personal and political opinions, age, health and economic conditions of its interlocutors, including its suppliers.

Those who believe they have experienced discrimination may report the incident to the Supervisory Organ or, if none, the Board of Directors or equivalent authority/role, that will proceed to verify the actual violation of the ethical code.

Honesty

Recipients must be aware of the ethical significance of their own actions and must not pursue personal or corporate profits by violating the laws in force and the rules of this Code.

In the formulation of contractual arrangements with customers, it is necessary to ensure that the clauses are formulated in a clear and understandable way, ensuring the maintenance of the condition of equality between the parties.

Integrity

Bedimensional S.p.A. does not approve or justify any action of violence or threats aimed at obtaining behavior contrary to current legislation and/or the Code of Ethics.

Transparency

The principle of transparency is based on the truthfulness, accuracy and completeness of the information both outside and inside the Company.

In accordance with the principle of transparency, every operation and transaction must be correctly recorded, authorized, verifiable, legitimate, coherent and congruous.

All actions and operations shall have an adequate registration and it must be possible to verify the decision-making, authorization and execution process.

For each operation there must be adequate documentary support in order to be able, at any time, to carry out checks that verify the operation's characteristics and motivations and identify who authorized, performed, recorded and verified the operation itself.

The Company must use objective and transparent criteria for choosing suppliers. This decision, in accordance with current regulations and internal procedures, must be based on objective assessments concerning the competitiveness, quality and the economic conditions applied.

Fair competition

Compliance with the principles of full transparency, fairness and honesty is intended to protect the market and guarantee the values of fair competition and commercial loyalty.

Bedimensional S.p.A. undertakes in not harming in any way the image of competitors and their products, repudiating any behavior that may even constitute potentially fraud on the market or disturb its regular exercise.

Efficiency

In all work activities it is necessary to pursue the best cost-effective management and use of corporate resources, while always respecting the most advanced quality standards.

Bedimensional S.p.A. also undertakes to protect and safeguard the company's resources and assets, as well as to manage its own corporate assets and capital by taking all the necessary precautions to always guarantee full appliance of the laws and regulations in force.



Privacy Protection

Bedimensional S.p.A. undertakes to protect the privacy of the Recipients, in compliance with the regulations in force, in order to avoid any risks of communication and dissemination of unauthorized personal data.

The acquisition and processing, as well as the storage of information and personal data of the Employees and of the other subjects of which the Company arranges the data, occurs in compliance with specific procedures aimed at preventing unauthorized persons and/or entities from becoming aware of them. These procedures comply with current regulations.

Human Resources Value

Human resources are considered fundamental and essential to the development of the Company. Bedimensional S.p.A. protects growth and professional development in order to increase the existing skills, in compliance with the current personal and individual rights, with particular regard to the moral and physical integrity of the Employees.

Bedimensional S.p.A. pledges not to promote any forms of patronage and nepotism, as well as not establish any business relationship with individuals involved in terrorism acts.

Employees are hired solely on the basis of valid employment contracts, as no form of irregular work is tolerated for Italian or foreign citizens. The candidate must be made aware of all the conditions concerning the employment relationship.

The recognition of salary increases or other incentive instruments and access to higher roles and assignments (promotions) are linked, in addition to the rules established by the law and by the collective labour agreement, to the individual merits of the employees, including the ability to express organizational conducts and skills deployed in accordance with the referential ethical principles of the Company, provided in this Code.

Relations with the community and environmental protection

Bedimensional S.p.A. recognizes the crucial importance of the environment protection in ensuring a coheren and balanced growth path.

Consequently, the Company undertakes to safeguard the environment and to contribute to the sustainable development of the territory, also through the use of the best available technologies and the constant monitoring of company processes, as well as the identification of more environmental-friendly industrial solutions.

All activities of BeDimensional S.p.A. must be conducted so as to comply with the provisions of environmental standards. The Company's search for benefits, if it involves or may involve the violation, intentional or negligent of environmental regulations, is never justified.

Anti-corruption measures

Bedimensional S.p.A. stigmatizes and condemns corruption and incitement to corruption, rejecting any act or fact of a corrupt nature (direct or indirect) to public officials or public service officers (Italian or foreign) or to and between private subjects.

The company must involve the Management and its collaborators in the promotion of the an anti-corruption culture, committing to develop supervisory activities on respect of anti-corruption measures, on ethics and on carrying out internal controls, developing suitable training programs, implementing the appropriate measures for the prevention, identification and reporting of potential violations.



Relations with local authorities and public institutions

Bedimensional S.p.A. pursues full integrity and fairness in relationships, also contractual, with public institutions and, in general, with Public Administration, including what concerns the request and / or management of public funds, in order to ensure maximum clarity in institutional relationships, in line with the specific needs for organizational and management autonomy typical of any economic operator.

Relations with institutional interlocutors are maintained exclusively through the persons appointed for this purpose.

If Bedimensional S.p.A. uses a consultant or "third party" entity to be represented in relations with the Public Administration, they will be required to comply with the guidelines applicable to the employees; furthermore, the Company shall not be represented in relations with the Public Administration, by a consultant or by a "third party" entity, if there is any, even potential, conflict of interests.

Relations with associations, trade unions and political parties

Bedimensional S.p.A. does not make direct or indirect contributions to the financing of political parties, movements, political and trade union committees and organizations, nor to their representatives or candidates.

Furthermore, the Company does not finance associations or sponsor events or congresses that have political propaganda as a goal.

Bedimensional S.p.A. can offer contributions and donations in support of subjects with social, moral, scientific and cultural aims.

Relations with international operators

Bedimensional S.p.A. undertakes to ensure that all of its relations, including those of a commercial nature, with internationally operating entities, are carried out in full compliance of the laws and regulations in force, in order to avoid committing cross-border felony.

On this matter, the Company undertakes to take all the necessary precautions required to verify the reliability of these operators, as well as the legitimate source of capital and means used by the latter within the relations with the Company.

In addition, within the limits of its possibilities, Bedimensional S.p.A. undertakes to collaborate, with fairness and transparency, with the Authorities, including foreign ones, which may request information or investigate about the relations between the Company and international operators.

Repudiation of all forms of terrorism

Bedimensional S.p.A. repudiates all forms of terrorism and intends, in its work, to take appropriate measures to prevent the risk of involvement in terrorism activities, so as to contribute to the affirmation of peace between peoples and democracy.

In so doing, the Company undertakes not to establish any working or commercial relationship with individuals, whether natural or legal persons, involved in terrorism acts, as well as not to finance or otherwise facilitate any of their activities.

Protection of the individual personality

Bedimensional S.p.A. recognizes the need to protect individual freedom in all its forms and repudiates all manifestations of violence, especially if aimed at limiting personal freedom, as well as every form of prostitution and/or child pornography.

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The Company is committed to promote the same principles within the framework of its business and its Recipients.

Health and safety protection at work

Bedimensional S.p.A. dedicates all of its efforts to ensure the maximum level of safety and health in the workplace.

In this respect, the Company adopts the most appropriate measures in order to avoid all work and business related risks and, where this is not possible, to appropriately assess the existing risks, in order to deal with them straight to the source and ensure their eradication or, where this is not possible, their management.

As part of its activity, Bedimensional S.p.A. undertakes to adapt work to man, including for what concerns the conception of workplaces and the choice of work equipment, working and production methods, and, in particular, undertakes to mitigate the monotonous and repetitive work, as well as to reduce the impacts of such work on health.

Concerning health and safety at work, Bedimensional S.p.A. also agrees to operate:

- a) adapting to technical progress;
- b) replacing the dangerous by the non-dangerous or the less dangerous;
- c) developing a coherent overall prevention policy which takes into account and covers technology, organization of work, working conditions, social relationships and the influence of factors related to the working environment;
- d) acknowledging that collective protection measures have priority over individual protection measures;
- e) giving proper instructions to the employees;
- f) periodically planning training activities and, in any case, whenever introduced improvements have significance in terms of workers' health and safety protection.

Those principles are used by Bedimensional S.p.A. for the identification and the adoption of measures necessary for the safety and health protection of workers, including prevention of occupational risks and provision of information and training, as well as provision of the necessary organization and means.

Recipients must stick to these principles, particularly when decisions or choices have to be made and, subsequently, when they need to be put into practice.

<u>Protection of transparency in commercial transactions (anti-money laundering)</u>

Bedimensional S.p.A. has as a foremost principle the maximum transparency in commercial transactions and draws up the most appropriate measures in order to counter the phenomena of money laundering and handling stolen goods.

Compliance with the principles of fairness, transparency and good faith in relations with all contractual counterparties must be ensured.

5. Rules of conduct

5.1. External relations

Bedimensional S.p.A. imprints its procurement process of goods and services pursuing the maximum competitive advantage, granting equal opportunities, loyalty and impartiality in relations with the parties involved.

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Bedimensional S.p.A. requires its suppliers, commercial partners and external collaborators to observe and respect its own correspondent ethical principles, considering it a critical aspect for the creation or continuation of a business relationship.

Every customer, supplier, business partner or external collaborator must be promptly informed of the existence of the Code of Ethics and of the commitment and obligations imposed by the same on external subjects.

5.1.1. The Customers

Customers are an integral part of corporate assets.

To consolidate customers' loyalty and esteem, it is vital that any relationship is based on criteria of loyalty, availability, transparency and professionalism.

The Company undertakes to provide every possible mean to continuously improve the professional skills of the employees in order to properly meet the needs of the interlocutor, providing any useful assistance to foster informed and shared choices, avoiding any kind of forcing.

In order to safeguard the company's reliability and prestige, Bedimensional S.p.A. has to:

- Have the full satisfaction of the customer as its primary target
- establish a solid relationship with the customer, inspired by fairness and efficiency;
- maintain a professional and loyal attitude towards the customer, which must be put in in condition to make conscious and informed decisions;
- use clear and simple forms of communication, compliant with the regulations in force, without resorting to elusive and in any case improper practices, so that no relevant element is overlooked, to ensure the customer's understanding;
- maintain relations with customers who present requirements of seriousness and personal and commercial reliability;
- refrain having business relationships with people whose involvement in illegal activities is known or suspected;
- reject all forms of "recommendation" or "conditioning" both internal and external. In any case, the relationships must be based on absolute compliance with the law in terms of anti-money laundering, protection of personal data, transparency
 and
 anti-usury.

5.1.2. Suppliers

Bedimensional S.p.A. in choosing the supplier will also take into account:

- assessment on the convenience of the offer, its compliance with company needs and the overall reliability of suppliers;
- the supplier's commitment to comply with standards of preservation and protection of the environment, collective bargaining and safety at work;
- ability to cope, in terms of the nature of the service, with confidentiality obligations; Also in relations with suppliers and external collaborators, Bedimensional S.p.A. has to stand by fairness, professionalism, efficiency, seriousness and reliability principles. It must be willing to promote friendly solutions to issues that might arise with suppliers, with a view to

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overcoming the divergent positions and to invite the parties to make a friendly settlement.

5.1.3. Public Administrations

The behavior of the Corporate Bodies and Personnel of Bedimensional S.p.A. towards the Public Administration they must be inspired by the maximum correctness and integrity.

Therefore, any logic of conditioning counterparty decisions, in any expressed or implemented form, aimed at influencing decisions in favor of Bedimensional SpA, or requesting or gaining preferential treatment, is refused. It is also forbidden to carry out requests from the Public Administration personnel, intended to subordinate decisions and deeds, in favor of Bedimensional S.p.A., into any kind of reward.

On the occurrence of such episodes, more or less explicit, is up to the employees to promptly inform their direct supervisor (and when circumstances require, or in more serious cases, directly to the Supervisory Organ or, if none, the Board of Directors). Relations with Public Administrations are held by designated corporate representatives.

All the documentation summarizing the procedures through which Bedimensional S.p.A. came into contact with Public Authorities must be duly collected and stored. In the event that the Company is involved in judicial proceedings for civil, criminal or administrative litigations, including out-of-court proceedings, the corporate organs and employees or professionals in charge, must not, in any way, adopt behaviors which may lead to unjustified measures for the benefit of the society.

In relations with the Judicial Authority, therefore, the most extensive cooperation must be offered, granting truthful statements, even if they are likely to seem harmful to the Company itself.

All forms of reticence, falsehood and secrecy are contrary to the desire for transparency Expressed by Bedimensional S.p.A.

5.1.4 Political Organizations and Trade Unions

Relations with political organizations and trade unions are maintained, with the utmost transparency and independence, by the responsible departments.

The company doesn't make any direct or indirect contributions in whatever form to political parties, movements, committees, political organizations and trade unions, nor to their representatives and candidates, which could, somehow, be traced back to the

company intention to favor them.

5.1.5 Media

Relations with the press and media in general are maintained exclusively by the function assigned to this by internal rules.

All external communication interventions must be authorized in advance.

Employees who may show up at meetings or public events, are supposed to do that exclusively on personal basis, and under no circumstances will be allowed to use the company's name and brand, unless authorized by Bedimensional S.p.A.

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5.1.6 Competitors

It's in the style of Bedimensional S.p.A. to avoid negative comments and assessments towards competitors, giving instead priority to the fair comparison on quality and transparency of the products and services offered.

5.2. Internal Relations

Bedimensional S.p.A. acknowledges the central role of people and the importance of establishing and maintaining relationships based on mutual respect and fairness, both with the employees and with the collaborators who work in favor of the Company in a contractual form other than subordinate employment.

Bedimensional S.p.A. expects its corporate bodies and employees to respect the ethical principles corresponding to its own, and undertakes to promptly inform them about the Code of Ethics and of the commitments and obligations imposed by it.

5.2.1. Partners

Regarding its Partners, Bedimensional S.p.A. undertakes to:

- ensure the efficient and full participation of all members to the meetings through timely provided informations regarding the subjects on the agenda, in order to achieve a fruitful dialogue between the shareholders, the Board of Directors and any supervisory organ;
- seek maximum transparency both in corporate communications and in personal relationships.

5.2.2 Corporate Bodies

Corporate Bodies, aware of their own responsibility, as well as the respect of the law, of the statute, of the supervisory regulations, are obliged to observe the terms of this Code of Ethics.

Their members are required:

- to maintain a behavior inspired by autonomy and independence with public institutions, private subjects, economic associations and political forces, giving correct information necessary for internal and external control activities;
- behave with integrity, loyalty, sense of responsibility towards the Company;
- assiduous and informed involvement;
- awareness of the role;
- sharing of common mission and critical awareness, in order to ensure a significant personal contribution;
- declare situations of conflicts of interests or incompatibility of functions, assignment or positions both outside and inside the Company.

5.2.3 Employees

Human resources are an essential business asset, their development represents a crucial factor for achieving company's objectives.

Company must:

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- adopt staff policies based on the enhancement of merit and development of expertise; in particular Bedimensional S.p.A. undertakes to adopt strictly professional criteria of merit and competence for what concerns any decision relating the work relationship both with its employees and external collaborators; therefore discriminatory practices are forbidden in the selection, recruitment, training, management, development and remuneration of the employees, as well as any form of nepotism and favoritism;
- fully inform the newly hired employee on the characteristics of the tasks and functions, on regulatory and remuneration elements and on the required compliance with the principles contained in this code;
- request the heads of operating units and all collaborators, each for their own area of responsibility, to adopt conducts that are consistent with the principles indicated in the previous point.

Without prejudice to the requirements of the law, the Statute, the regulations and internal legislation, as well as the contractual regulations in force, in the performance of their service, employees must conform their action to the principles expressed in this Code of Ethics.

All the company employees must:

- base their behavior on the observance of principles of protection and respect
 of the human person, on loyalty, on correctness in personal relationships and
 on operational logic based on integration and cross-functional collaboration,
 on making people responsible, on team spirit and on respect for
 subordination and reporting lines in order to pursue business goals;
- avoid putting in place operations in conflict of interest, promptly informing the immediate superior of any family relationship, direct or indirect, with the counterparties with whom is about to establish or manage a business relationship on behalf of Bedimensional S.p.A.;
- treat with absolute confidentiality any data, news and information acquired, avoiding its dissemination or its own use for speculative purposes or for those of third parties, and in any case protecting the principles of loyalty, correctness and transparency above mentioned. Confidential information may be disclosed, within the framework of Company's structures and offices, only with respect to those who actually need to know them for work purposes;
- prove in every relations with interlocutors, with whom he comes in contact with for business reasons, great moral integrity, avoiding attitudes that would call into question this quality;
- preserve and protect the values and the goods that have been them entrusted and contribute to the protection of corporate assets in general, avoiding situations which might adversely affect the integrity and security of said assets;
- avoid using the Company's resources, assets or materials for personal gain, or for improper purposes;
- prevent that an unbalanced personal financial situation may affect in any way the work activity;

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- refuse gifts (which aren't only of absolutely symbolic value), remuneration or benefits of any kind from customers or other entities with whom Bedimensional S.p.A. establishes a business relationship and that, according to common sense, may be interpreted as a means of pressure;
- refrain from requiring, directly or indirectly, recommendations and any other preferential treatment contrary to the principles laid down by this Ethical Code.

Each employee, within their duties and within the limits set by law, shall:

- stand out for proactivity;
- increase their preparation and professionalism by any means;
- make use of the colleagues' proposals for improvement;
- contribute to the professional growth of its collaborators;
- make decisions and take risks according to the logic of sound and prudent management, ensuring the economic and efficient use of resources in compliance both with the law and internal regulations, as well as the correct use both of the procedures and of the risk control framework; in particular, if called on to service the credit and business relations in general, to do this by the proxies received and safeguarding the corporate assets in any case;
- be able to recognize their own mistakes and take action to correct them;
- consider the company's result as a personal responsibility, cause for satisfaction and result of group work;
- seize, as an opportunity to improve, the claims and/or reports of customers intended to suggest procedures' and services' improvements.

All staff members are also required to timely inform their superior when:

- is aware of infringements of laws or regulations or of this Ethical Code, in a business setting;
- is aware of omissions, negligence or falsification in the keeping of the accounts or in the documentation storage underpinning the accounting records.
- is aware of any irregularities or malfunctions relating to the management and the ways of providing the services;
- gifts or benefits have been offered by subjects with whom the company has business relationships;
- is reported of any orders received deemed to contravene the law, the internal regulations or this Ethical Code; in the certainty that no retaliation will be made against him.
- The use of work tools, with reference to new IT technologies such as electronic door and internet, occurs in strict compliance with the law and internal regulations, therefore, the use outside the work's tasks and activities is prohibited.

5.2.4. Code of Ethics' Diffusion and Training

The Company undertakes to ensure timely Code of Ethics' internal and external diffusion and to promote its sharing through:

- distribution to all corporate members and all the employees
- bill-posting it in a place accessible to all;

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 making it available to third party recipients, and any other interlocutor, on the Company's website and on the company intranet and/or inclusion of specific contractual clauses.

The Supervisory Board promotes periodic training initiatives on the principles of this Code, also planned in consideration of the need to diversify tasks according to the role and responsibility of the resources involved, i.e through the provision of a stronger and more specialized training to subjects qualifiable as "Apical" on par with Legislative Decree 231/2001, as well as to those operating in areas qualifiable as "at risk" in accordance with the organizational model in use.

5.2.5. Code of Ethics' Review

The Code review is approved by the Board of Directors of Bedimensional S.p.A., upon proposal of the Chief Executive Officer with the agreement of the Chairman, after hearing the opinion of the Board of Statutory Auditors.

The proposal is made taking into consideration the Stakeholders' evaluation with reference to the principles and contents of the Code, promoting active contribution and notification of possible deficiencies by Stakeholders themselves.

6. Penalty Provisions

Respect of the Code's rules is an essential part of the contractual obligations of all employees.

Any violation of the Code's rules may be considered as a violation of primary obligations under labour relations or of the rules of discipline and can entail the consequences provided for by law, including termination of the work contract and compensation for damages arising out of any violation.

Respect of the Code's rules is an essential part of the contractual obligations of non-subordinate collaborators and/or subjects having business relations with the Company. Any violation of the Code's rules may be considered as a violation of contractual obligations, with all legal consequential implications, including the termination of the contract in and/or the assignment and may lead to compensation for damages arising out of it.

The Company undertakes to anticipate and impose, with consistency, impartiality and uniformity, penalties commensurate with the respective violations of the Code and compliant with the legal provisions in force in terms of labour relations regulations.

BOARD OF DIRECTORS, BEDIMENSIONAL SPA