

**LOMBARDI INGEGNERIA S.r.l.**

**ORGANIZATION AND MANAGEMENT MODEL  
PURSUANT TO LEGISLATIVE DECREE NO. 231 OF 2001**

**CODE OF ETHICS**

Approved by Board of Directors on April 18<sup>th</sup>, 2025

Effective from June 9<sup>th</sup>, 2025

**Lombardi Ingegneria S.r.l. – Socio Unico**

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## 1. PRELIMINARY PROVISIONS

### 1.1 Foreword

This Code of Ethics (the “Code”) sets out the values, ethical principles, and rules of conduct that Shareholders, the Management Body (hereinafter referred to as the “Company Management”), Employees (both Executives and non-Executives), Suppliers, External Collaborators (Professionals and Consultants), Partners, and all those who act in the name and on behalf of Lombardi Ingegneria S.r.l. (the “Recipients”) are required to observe.

The Company bases its operations on the principles contained in this Code, in the belief that ethics in business conduct is to be pursued as a value itself and constitutes the foundation for achieving the company’s objectives.

This Code forms an integral part of the Organization and Management Model (the “Model”) adopted by Lombardi Ingegneria S.r.l..

### 1.2 Recipients and purpose

Shareholders, the Company Management, Employees (both Executives and non-Executives), Suppliers, External Collaborators (Professionals and Consultants), Partners, and all those who act in the name and on behalf of Lombardi Ingegneria S.r.l. are required to comply with the provisions of this Code of Ethics.

The principles and provisions of this Code of Ethics represent illustrative specifications of the general obligations of diligence, fairness, and loyalty that must guide the Company’s Management Body in any decision or action related to the Company’s operations.

Executives, in carrying out their management activities, must also adhere to these principles, in order to serve as role models for the Company’s Employees and Collaborators.

Compliance with the provisions of the Code of Ethics is an integral part of the contractual obligations of Employees, also pursuant to and for the purposes of Article 2104<sup>1</sup> of the Italian Civil Code.

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<sup>1</sup> Art. 2104 of the Italian Civil Code – “Diligence of the Employee”: *“The employee must exercise the diligence required by the nature of the work to be performed, by the interest of the company, and by the broader interest of national production. The employee must also comply with the instructions for carrying out and regulating the work as given by the employer and by those to whom the employee is hierarchically subordinate”.*

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Any breach of these provisions by the Recipients may constitute, depending on the case, a disciplinary offense (subject to applicable laws and regulations) and/or a contractual breach and may result in liability for damages caused to the Company as a result of such breach.

## **2. CORE PRINCIPLES**

### **2.1 Legality**

Lombardi Ingegneria S.r.l. recognizes compliance with laws, regulations, and applicable rules as a fundamental principle.

Within the scope of their roles and in the performance of their respective activities, the Recipients are required to comply with the legal systems (national, supranational, or foreign) in which they operate and must in all cases refrain from violating any laws or regulations.

Each Recipient must diligently acquire the necessary knowledge of the legal provisions applicable to the performance of their duties, as in force from time to time.

Each Employee must comply not only with the general principles of diligence and loyalty as set forth in Article 2104 of the Italian Civil Code, but also with the behavioural requirements contained in the applicable collective labour agreements.

### **2.2 Integrity**

Each Recipient, in the performance of their duties, shall adopt behaviour guided by transparency and moral integrity, considering the relevant social, economic, political, and cultural contexts and particularly the values of honesty, fairness and good faith.

### **2.3 Dignity and Equality**

The Company respects the fundamental rights of individuals, safeguarding their moral integrity and ensuring equal opportunities.

Each Recipient recognizes and respects the personal dignity, privacy, and individual rights of every person.

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Each Recipient works and interacts in the workplace without making any distinction based on gender, nationality, language, culture, religion, race, ethnicity, political opinions, or personal and social conditions.

The Company does not tolerate any form of discrimination, harassment, or sexual, personal, or any other kind of offense.

## **2.4 Professionalism and team-orientation**

Each Recipient performs their own duties with the professionalism required by the nature of the tasks assigned, dedicating maximum effort to achieve the objectives set and assuming the responsibilities arising from their roles.

In compliance with the principle of professionalism that must be observed in the execution of their activities, each Recipient diligently undertakes the necessary study and training to deepen and update their knowledge.

Mutual collaboration among all individuals involved in any capacity in the same project or business process is an essential principle for the Company.

## **2.5 Conflict of interest**

Recipients, in the performance of their duties, must avoid conflicts of interest, whether potential or actual.

The following situations (examples) constitute conflicts of interest:

- the Recipient having a direct or indirect interest in activities of suppliers, clients, or competitors;
- using one's functional position to pursue interests that conflict with those of the Company;
- using information acquired in the course of work activities for personal gain or for the benefit of third parties, in any case contrary to the interests of the Company;
- holding corporate positions or performing any type of work for clients, suppliers, partners, competitors, or third parties that conflict with the interests of Lombardi Ingegneria S.r.l.

Any situation potentially likely to create a conflict of interest, or that could otherwise compromise the Recipient's ability to make decisions in the best interest of the Company, must be immediately reported by the Employee to their hierarchical supervisor or by the Collaborator to their company contact.

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Hierarchical supervisors and company contacts shall inform the Management Body of the existence of a conflict-of-interest situation involving the Recipient.

Company Management must notify the Supervisory Body of any conflict of interest that the Recipient may have, either on their own behalf or on behalf of third parties, in each Company transaction, specifying its nature, terms, origin and extent.

## **2.6 Criminal proceedings**

All Recipients involved in criminal proceedings must cooperate with the Judicial Authority and provide truthful, transparent, and accurate statements of the facts, without prejudice to the right to remain silent in cases provided for by law.

It is expressly prohibited to:

- engage in any activity that may favour or harm any party involved in the criminal proceedings;
- influence, in any form or manner, the will of individuals who must respond to the Judicial Authority to prevent them from making statements or to induce them to state untruthful facts;
- promise or offer money, gifts, or other benefits to persons involved in criminal proceedings or to their close associates.

## **2.7 Traceability**

All actions and dealings with third parties must be conducted ensuring fairness, completeness, consistency, transparency, and timely communication to enable third parties to make informed decisions.

Recipients must maintain adequate documentation of the transactions carried out to be able, at any time, to verify the characteristics of the transaction and the underlying reasons during the various stages of authorization, execution, recording and review.

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### 3. EXTERNAL RELATIONS

#### 3.1 Communications to external parties

Outgoing Information must be truthful, clear, and transparent.

Communication and dissemination of news related to the Company's activities are exclusively reserved for formally authorized company representatives. Therefore, it is prohibited for anyone else to disclose information concerning Lombardi Ingegneria S.r.l. without prior authorization from the designated company representatives.

Relations with the mass media (press, television, and all forms of mass communication), both national and international, are managed exclusively by the Company Management or by the company representatives delegated by them.

Recipients must also refrain from spreading false or misleading information that could deceive the community.

Furthermore, disclosure of work-related documents or information to external parties is prohibited, except for cases involving the communication of relevant violations under the Whistleblowing regulations, and only when the conditions expressly set forth in Article 15 of Legislative Decree No. 24 of 2023 are met<sup>2</sup>.

In line with the spirit of collaboration promoted by the Company and with the aim of guiding everyone's conduct towards full compliance with the principles of legality and integrity, each Recipient of this Code of Ethics is also encouraged to promptly report to the person designated by the Company as Responsible for managing the internal whistleblowing channel any publicly available information, however disseminated and received, concerning violations relevant under Legislative Decree No. 24 of 2023, allegedly occurring within the workplace context.

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<sup>2</sup> Article 15 of Legislative Decree No. 24 of 2023: 1. "A whistleblower who makes a public disclosure benefits from the protection provided for by this decree if, at the time of the public disclosure, one of the following conditions applies:

a) the whistleblower has previously made an internal and external report or has directly made an external report, under the conditions and procedures set forth in Articles 4 and 7, and no response has been given within the terms provided for in Articles 5 and 8 regarding the measures planned or taken to follow up on the reports;

b) the whistleblower has reasonable grounds to believe that the violation may pose an imminent or obvious danger to the public interest;

c) the whistleblower has reasonable grounds to believe that the external reporting may involve a risk of retaliation or may not be effective due to the specific circumstances of the case, such as situations where evidence may be concealed or destroyed, or where there is a justified fear that the recipient of the report may be colluding with or involved in the violation.

2. The rules on professional secrecy for practicing journalists, regarding the source of the information, remain unaffected."

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### **3.2 Relations with Clients**

Lombardi Ingegneria S.r.l. strives to meet the legitimate expectations of its clients by providing quality services in compliance with the commitments and obligations undertaken towards them, as well as with laws protecting competition and the market.

To this end, the Company is committed to responding to clients' suggestions and complaints. Under no circumstances may satisfying clients' expectations and needs justify dishonest conduct or behaviours that are unlawful or in violation of applicable laws and regulations.

The Company undertakes to maintain and conduct relationships with clients, including commercial ones, in a fair, loyal, and professional manner.

The Company provides clear, accurate, and truthful information during negotiations and assumes responsibility for contractual obligations, ensuring their diligent fulfilment.

### **3.3 Relations with Suppliers and External Collaborators (Professionals and Consultants)**

In its relationships with suppliers and external collaborators, the Company is guided by principles of transparency, equality, and fairness.

Lombardi Ingegneria S.r.l. bases its relationships with suppliers on criteria of trust, quality, competitiveness, professionalism and respect for rules.

The selection of suppliers and, in any case, the purchase of goods and services of any kind are carried out based on objective and documentable criteria, aimed at finding the best balance between economic advantage and quality of performance.

In this context, Lombardi Ingegneria S.r.l. selects counterparts based on their reliability and professionalism.

In managing relationships with suppliers, Recipients are required to:

- verify the identity of third parties with whom the Company interacts;
- establish relationships only with parties that have a respectable reputation, operate legally and share a corporate culture comparable to that of the Company;
- identify and select professionals and consultants with absolute impartiality, autonomy and independence of judgment;

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- not discriminate against suppliers, professionals, and consultants, allowing all qualified parties to compete for contract awards by selecting candidates based on objective, declared, transparent, and documentable criteria;
- operate in compliance with internal rules by entrusting the management of relationships with suppliers, consultants, and collaborators exclusively to the designated company functions;
- properly formalize all supplies and consulting agreements;
- document the reasons for the choices made;
- maintain an open and honest dialogue in accordance with good practices;
- refrain from seeking personal gain by accepting advantages or special benefits in company operations;
- apply and enforce contractually agreed conditions;
- contractually require suppliers to comply with laws, as well as to acknowledge and adhere to the principles established by this Code.

The Company reserves the contractual right to take all appropriate measures (including contract termination) if the supplier violates laws or the provisions of this Code.

### **3.4 Relations with partners**

Lombardi Ingegneria S.r.l. is committed to developing initiatives with partners with competence, precision, dedication, and efficiency, as well as managing relationships with partners with honesty, loyalty, and transparency.

Furthermore, Recipients are required to:

- select partners based on objective, transparent, and documentable evaluation criteria, respecting the existing hierarchical structures;
- establish relationships exclusively with partners who have a respectable reputation in the market and whose corporate ethical culture is comparable to that of the Company;
- collaborate with partners who operate in compliance with applicable laws and regulations;
- maintain collaborative relationships with partners.

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### **3.5 Relations with Governments, Institutions and Public Offices or Bodies with public functions**

4. Relations with the Public Administration and public institutions (including but not limited to public entities, organizations and companies operating in the public services sector, territorial entities, local authorities, the Data Protection Authority, supervisory authorities) are managed by the Company's Top Management or by corporate representatives delegated by it, in compliance with the rules of this Code and the corporate bylaws, with particular attention to the principles of fairness, transparency, and efficiency.

For this reason, Recipients cannot:

- promise or offer money, goods, or other benefits (except for gifts or benefits of low value and in any case conforming to customary practices), even under unlawful pressure, to public officials or public service officers, or to persons related to them, with the aim of promoting or favouring the interests of Lombardi Ingegneria S.r.l.;
- resort to other forms of contribution which, under the guise of professional assignments, consulting, advertising or otherwise—even involving third parties—have the same purpose of influencing the activities of public officials or public service officers in the performance of their duties.

Recipients must fully cooperate with Public Officials during any inspections, promptly providing clear, transparent, and truthful information.

Regarding any requests of any nature from the Judicial Authority and, more generally, in any contact with it, Recipients undertake to provide maximum cooperation, to make truthful and factual statements, and to refrain from any conduct that may obstruct the investigation, always in full compliance with the law and in accordance with the principles of loyalty, fairness, and transparency.

### **3.6 Relations with Political Parties, Trade Unions and other interest groups**

Relations with political parties, trade unions, and other interest groups are managed by the Company's Top Management or by corporate representatives delegated by it, in compliance with the rules of this Code and the corporate bylaws, with particular attention to the principles of impartiality and independence.

Lombardi Ingegneria S.r.l. does not provide contributions of any kind, either directly or indirectly, to trade unions and political parties, nor to their representatives or candidates, except in the forms and

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ways allowed by applicable laws. The Company bases its relations with these entities on principles of fairness and cooperation in the interest of the Company and its employees.

### **3.7 Gifts, benefits or other advantages**

Recipients are prohibited from offering, granting, promising, or providing to third parties, as well as accepting or receiving from third parties, directly or indirectly, including on festive occasions, gifts, benefits, or other advantages (including money, goods, or services) that are not authorized.

Only gifts of modest value that can be directly attributed to normal courtesy relationships are permitted, and in any case, such gifts must not create, either in the recipient or in a third party, the impression that they are intended to acquire or grant undue advantages or give rise to impressions of illegality or immorality.

A Recipient who receives gifts or offers of gifts that do not comply with the above must immediately inform their Supervisor.

Recipients are forbidden from soliciting the offer or granting, as well as the acceptance or receipt, of gifts of any kind, even if of modest value.

## **5. ACCOUNTING AND INTERNAL CONTROLS**

### **4.1 Accounting records**

Accounting is based on generally accepted accounting principles and systematically records all events arising from the management of the Company.

Accounting records are maintained according to the principles of transparency, truthfulness, completeness, clarity, precision, accuracy, and compliance with applicable regulations.

Adequate documentation is retained to support each transaction to enable easy accounting entry, reconstruction of the operation, and identification of any responsibilities.

For every accounting entry reflecting a corporate transaction, adequate supporting documentation must be preserved.

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Lombardi Ingegneria S.r.l. requires compliance with all applicable regulations, particularly those concerning the preparation of financial statements and all types of mandatory administrative and accounting documentation.

The financial statements must truthfully, clearly, and completely represent the economic, asset, and financial situation of the Company.

The Recipients are required to collaborate in the correct and timely recording in the accounting system of all management activities and to ensure that the management facts are accurately and promptly represented so that the administrative-accounting system can achieve its objectives.

The Recipients must promptly report both the existence of errors or omissions in the accounting process of management facts and any behaviours that do not comply with the provisions of this paragraph.

#### **4.2 Relations with Supervisory authorities**

Lombardi Ingegneria S.r.l. bases its relations with Supervisory Authorities on the utmost diligence, professionalism, transparency, cooperation, and availability, fully respecting their institutional role, promptly and accurately complying with the prescriptions and any required obligations.

Data and documents are made available in a timely manner and using language that is as objective and comprehensive as possible to provide information that is accurate, complete, truthful, and reliable, while avoiding and, in any case, reporting conflicts of interest in appropriate forms and ways.

It is strictly prohibited to prevent or obstruct the legally assigned control activities carried out by the Supervisory Authorities.

#### **4.3 Internal controls**

Lombardi Ingegneria S.r.l. implements an internal control system aimed at verifying and guiding the corporate organization, as well as ensuring compliance with legal and regulatory provisions.

Each Recipient, within the limits of their functions and assigned tasks, is responsible for defining and ensuring the proper functioning of the control system and for maintaining adequate documentation of every operation performed.

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#### **4.4 Anti-money laundering**

Lombardi Ingegneria S.r.l. conducts its business in full compliance with current anti-money laundering regulations and the provisions issued by the Authorities.

To this end, the Company is committed to avoiding suspicious operations in terms of correctness and transparency. Therefore, the Recipients undertake to preliminarily verify the available information concerning clients, suppliers, and external collaborators, to assess their respectability and the legitimacy of their activities before establishing any relationship with them. The Recipients abstain from any involvement in operations potentially suitable to facilitate money laundering derived from illegal or criminal activities.

Recipients must not, under any circumstances, engage in self-laundering conduct, meaning committing or participating in committing any crime and subsequently using, replacing, or transferring in economic, financial, entrepreneurial, or speculative activities the money, assets, or other benefits originating from that crime to effectively hinder the identification of their illicit origin.

Finally, the Recipients commit to ensuring full traceability of the Company's use of funds, even if the resources come from the Company itself, and to avoid the use of cash, except in cases regulated by internal procedures and always respecting the limits established by law.

#### **4.5 Tax, financial and contribution obligations**

Lombardi Ingegneria S.r.l. bases its activities on compliance with current tax and fiscal regulations, ensuring the proper maintenance of accounting records and other legally required registers, as well as the timely fulfilment of all expected reporting and payment obligations.

The receipt, recording, and issuance of invoices and/or other expense documents must be properly documented in accordance with the procedures adopted by the Company, ensuring the traceability of the underlying transactions and control over the correct fulfilment of each individual obligation.

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## 6. HUMAN RESOURCES

### 5.1 *Selection, development and training of personnel*

The Company places the utmost and constant attention on the enhancement of human resources. Loyalty, capability, professionalism, seriousness, preparation, and dedication of personnel represent fundamental values and conditions for achieving the Company's objectives.

In the context of personnel selection and hiring — conducted in compliance with the principles of meritocracy and professional competence, internal procedures, equal opportunities, and without any discrimination, inspired by criteria of transparency, ability, and individual potential — Lombardi Ingegneria S.r.l. ensures that the resources acquired correspond to the profiles genuinely necessary for the company's needs, avoiding favouritism and any kind of advantage.

Remuneration is determined solely on evaluations related to training, specific professionalism, acquired experience, demonstrated merit, and achievement of assigned objectives.

The Company is committed to protecting the psycho-physical integrity of employees, respecting their personality, prohibiting any form of harassment — psychological, physical, sexual — against employees, collaborators, suppliers, or visitors. Therefore, internal and external working relationships must not give rise to harassment, such as:

- creation of an intimidating, hostile, or isolating work environment towards individuals or groups of workers;
- unjustified interference with the execution of others' work tasks;
- obstruction of individual work prospects for mere reasons of personal competition.

Furthermore, any acts of retaliation against Recipients who refuse to engage in unlawful conduct or who report or complain about such behaviours are also prohibited.

The Company processes the personal data of its employees/collaborators in compliance with current data protection regulations. The Company provides its employees/collaborators with the necessary information describing the personal data processing carried out for managing the employment relationship. The information notice is issued in accordance with current data protection laws and internal policies. As part of this information activity, as required by labour rights protection regulations, the Company informs its employees/collaborators about the lawful and ethical use of tools employed to perform their work and about access and attendance recording tools.

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It is the duty of the Company's management to support the professional development of each employee/collaborator, adequately motivate them, and work to create and maintain open dialogue and good relations with them.

It is the duty of all employees/collaborators of Lombardi Ingegneria S.r.l. to cooperate in maintaining internal relations in line with company principles and procedures, participate in the training process according to their skills, and respect organizational structures, also to ensure proper and orderly activation of the internal control chain and the creation of a precise and articulated framework of responsibilities.

## **5.2 Equal opportunities**

It is among the Company's objectives to create a work environment in which respect for the person, their dignity, and their values is expressly and constantly upheld, avoiding any discrimination based on gender, racial and ethnic origin, nationality, age, political opinions, religious beliefs, health status, sexual orientation, and socio-economic conditions.

All Recipients are required to collaborate in achieving this objective.

## **5.3 Use of Company equipment and facilities**

The company assets of Lombardi Ingegneria S.r.l., and particularly the facilities and equipment located in the workplaces, are to be used solely for work-related purposes, in accordance with applicable laws and regulations.

Under no circumstances is it permitted to use company assets for purposes contrary to legal norms, public order, or good morals, nor to commit or incite the commission of crimes, racial intolerance, the glorification of violence, or the violation of human rights.

Furthermore, all Recipients are required to properly use equipment, safety devices, tools and software, means of transport, and other work equipment, and to immediately report any hazardous conditions to the employer, taking direct action, in urgent situations, within their own competence and capabilities.

## **5.4 Alcohol and drugs**

The use of alcohol and drugs in the workplace is strictly prohibited.

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## 7. CORPORATE POLICIES

### 6.1 *Environmental protection and Health and safety in the workplace*

Lombardi Ingegneria S.r.l. places the utmost importance on respecting the interests of the community and considers the environment and nature as fundamental values and a heritage for all, to be protected and defended. The company commits to adopting responsible behaviours for environmental safeguarding, acting in compliance with applicable environmental protection laws, as well as with the limits set by authorizations and prescriptions of the competent authorities, while avoiding harmful conduct towards the environment.

Lombardi Ingegneria S.r.l. recognizes environmental management and the protection of health and safety in the workplace as major priorities, clearly assigning roles and responsibilities, defining procedures for managing environmental and safety obligations, and promoting communication between all relevant internal and external parties.

Moreover, Lombardi Ingegneria S.r.l. raises awareness among employees, collaborators, and all those who operate in its name and on its behalf regarding the respect and safeguarding of the environment to avoid or minimize any negative impact resulting from the conduct of its business activities.

The company determines provisions to ensure proper waste management and the handling of potential environmental emergency situations.

Lombardi Ingegneria S.r.l. conducts its activities with particular attention to the work environment and the safety of its personnel and third parties, aiming for constant improvement in its performance in these areas and promptly complying with current workplace safety regulations.

Each Recipient must exercise maximum care in performing their activities, strictly observing all established safety and prevention measures to avoid any possible risks to themselves, their colleagues, and third parties.

Particularly, Recipients are required to comply with instructions and directives issued by those to whom the Company has delegated the fulfilment of obligations concerning health and safety in the workplace.

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## 8. DATA PROCESSING AND INFORMATION MANAGEMENT

### 7.1 *Protection of privacy*

Lombardi Ingegneria S.r.l. is committed to protecting the information and data related to its employees, clients, and third parties, generated or acquired during the working relationship, and to preventing any misuse thereof.

The Company aims to ensure that the processing of personal data within its facilities is carried out in compliance with the rights and fundamental freedoms, as well as the dignity, of the data subjects, as provided by applicable legal provisions.

The processing of personal data must be conducted lawfully and fairly, and only data necessary for specific, explicit and legitimate purposes shall be collected and recorded.

### 7.2 *Information circulation*

The circulation of information must be managed according to principles of truthfulness, accuracy and timeliness. To this end, both internal and external communications must be drafted clearly, diligently and in compliance with these principles and applicable regulations.

### 7.3 *Management of “confidential information”*

“Confidential information” refers to knowledge of a project, proposal, initiative, negotiation, understanding, commitment, agreement, fact, or event — even if future and uncertain — related to the activities of Lombardi Ingegneria S.r.l. that is not in the public domain and that, if disclosed, could cause harm to the Company.

In general, all information not in the public domain must be considered confidential and used solely for the purposes of performing one's work duties.

Recipients who, in the performance of their duties, become aware of confidential information must not disclose it to third parties except for work-related or professional reasons, and only with prior authorization from their superior and in compliance with applicable laws and procedures.

The Company ensures the protection of information and data contained or stored in IT systems through the adoption of appropriate security measures.

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Any form of exploitation, economic utilization, direct or indirect investment of confidential company information is contrary to the law and therefore strictly prohibited.

#### **7.4 Use of information systems**

The Recipients shall use the assigned IT resources exclusively for the performance of their work activities, in full compliance with the regulations on the use and management of information systems and with the Company's defined procedures.

Under no circumstances it is permitted to use IT and network resources for purposes that are contrary to the law, public order, or public decency, or in any way aimed at promoting racial intolerance, inciting violence, or violating human rights, as well as for committing or inducing the commission of crimes, damaging or altering the information systems or data of third parties (private or public), or unlawfully obtaining confidential information.

Recipients are also prohibited from installing unlicensed software on the Company's computers or from using and/or copying documents and materials protected by copyright (including audiovisual, electronic, paper, or photographic recordings or reproductions) without the express authorization of the rights holder.

Finally, it is strictly forbidden to download content illegally or to transmit copyrighted material to third parties in violation of copyright laws.

### **9. IMPLEMENTATION OF THE CODE OF ETHICS**

Lombardi Ingegneria S.r.l. ensures that the Recipients are informed of the provisions contained in this Code of Ethics and promotes its widest dissemination.

The Company is also committed to implementing the Code by overseeing its interpretation and updating, as well as verifying its actual compliance.

All Recipients are required to contribute to the effective implementation of the Code, within the limits of their roles and responsibilities.

Lombardi Ingegneria S.r.l. is responsible for preventing and sanctioning any form of retaliation against those who contribute to the implementation of this Code.

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## 10. DUTIES OF THE SUPERVISORY BODY AND RELATED REPORTING

The responsibility for monitoring the implementation and adequacy of this Code lies with the Supervisory Body, which is vested with autonomous powers of initiative and control and appointed by the Company's Board of Directors pursuant to Legislative Decree No. 231 of 2001.

The Supervisory Body of Lombardi Ingegneria S.r.l. has the powers, duties, and responsibilities set forth in the Organizational Model implemented under the aforementioned legislation.

Without prejudice to all protections provided by applicable laws or collective agreements, and subject to legal obligations and the provisions already established on whistleblowing, according to the Organizational Act adopted by the Company in compliance with Legislative Decree No. 24 of 2023, Recipients may send the Supervisory Body requests for clarification, complaints, or information about potential or actual breaches of this Code by writing directly to the following email address:

[odv@lombardi.group](mailto:odv@lombardi.group)

All information received will be handled with the utmost confidentiality, in accordance with applicable legal provisions.

## 11. VIOLATIONS OF THE CODE OF ETHICS

This Code of Ethics constitutes an integral part of the Organization, Management and Control Model of Lombardi Ingegneria S.r.l., and its violation amounts to a breach of the Model.

It is the obligation of each Recipient to promptly report any behaviour that is not compliant with the principles and behavioural rules outlined in this Code, in accordance with the provisions of the Organizational Act adopted by the Company regarding Whistleblowing and with the safeguards established by Legislative Decree No. 24 of 2023.

Compliance with the rules contained in this Code must therefore be regarded as an essential part of the contractual obligations for Employees (both Managers and non-Managers) of Lombardi Ingegneria S.r.l., pursuant to Article 2104 of the Italian Civil Code, as well as for Suppliers, External Collaborators (Professionals and Consultants), and Partners of the Company, with reference to the respective contractual relationships.

Failure to comply with the behavioural rules set out in this Code of Ethics constitutes a breach of the obligations arising from the employment relationship and will result in the application of disciplinary sanctions in accordance with applicable law.

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The Company, through the designated bodies and functions, will ascertain any violations and impose sanctions in a consistent, impartial, and uniform manner, proportionate to the respective violations and in accordance with applicable labour regulations.

Violations of the Code of Ethics by the administrative body or shareholders will be assessed by the Shareholders' Meeting.

Violation of the provisions of this Code may lead, in the most serious cases, to the termination of the contractual relationship and/or the removal from office, without prejudice to any claims for compensation in case that behaviour causes damage to Lombardi Ingegneria S.r.l.

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