

LOMBARDI INGEGNERIA S.R.L.

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

Approved by Board of Directors on April 18th, 2025

Effective from June 9th, 2025

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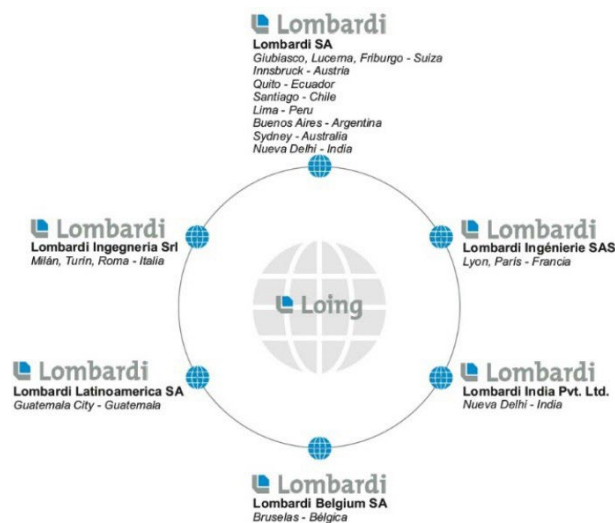
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PREMISE

1. LOMBARDI INGEGNERIA S.R.L.

Lombardi Ingegneria S.r.l., founded in 1997, operates within Lombardi Group in the fields of structural engineering, geotechnics, tunnelling, environmental engineering, and electromechanical systems. The company develops civil engineering projects such as roads, railways, bridges, tunnels, subways, hydraulic works, civil and industrial buildings, underground structures, ground consolidations, and more. Its main areas of activity, in addition to Italy, include Europe, South America, Asia and Oceania.



Specifically, the company carries out feasibility studies, research, consulting, design, construction supervision, health and safety coordination plans (during both design and execution phases), testing, technical and economic feasibility assessments, and environmental impact studies, in full compliance with all applicable regulations.

To perform its tasks, the company is equipped with the most modern computerized calculation and drafting tools, including the B.I.M. methodology, fully integrated with traditional design systems.

Lombardi Ingegneria S.r.l. has its registered office in Milan, Via Giotto No. 36 and two branch offices located in Rome, Via XX Settembre No. 98/G, and in Turin, Via Raimondo Montecuccoli No. 9.

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2. PURPOSES OF ORGANISATION AND MANAGEMENT MODEL

This document, together with all its annexes, constitutes the **Organisation and Management Model** (hereinafter also referred to as the “Model”) adopted by **Lombardi Ingegneria S.r.l.** pursuant to Italian Legislative Decree no. 231 of June 8, 2001 (hereinafter also referred to as “Legislative Decree 231 of 2001” or the “Decree”), as approved by the Board of Directors on April 18, 2025 and effective as of June 9, 2025.

The Company intends to operate in strict compliance with the law. To this end, with the adoption of this Model, it has equipped itself with an organizational system aimed at preventing the risk of criminal offences, through the identification of high-risk activities and the establishment of behavioural rules that employees must follow.

The Company is firmly convinced that a *business* model aligned with the entire applicable regulatory framework represents an effective tool to raise awareness among Recipients (as defined in § 4) and to promote proper and transparent conduct that can prevent the commission of criminal offences. At the same time, it enables the achievement of meaningful and lasting economic results.

All employees must be aware of this perspective and must conduct their daily activities in compliance with the law, operating according to the Model and maintaining a constructive exchange of information with the Supervisory Body, including for the resolution of issues not explicitly treated in the Model.

Through this Model, Lombardi Ingegneria S.r.l. specifically aims to achieve the following purposes:

- complying with the regulations on corporate administrative liability, and to verify and enhance existing safeguards designed to prevent unlawful conduct as defined by Legislative Decree No. 231 of 2001;
- informing all Recipients of the Company’s compliance with the above-mentioned legislation and of the ethical principles that guide its operations;
- informing all Recipients about the content of Legislative Decree No. 231 of 2001, its significance, and the sanctions that may be imposed on the Company in the event of the commission of criminal or administrative offences that trigger the entity’s liability;
- explaining to all Recipients that Lombardi Ingegneria S.r.l. does not tolerate any conduct that, even if seemingly aimed at benefiting the Company, is in violation of laws, regulations, supervisory provisions, internal company rules, or the principles of sound and proper business management upon which the Company bases its operations.

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3. STRUCTURE OF THE MODEL

The Model is divided into two sections:

- I. “*Legislative Decree No. 231 of 2001*” – a general section to illustrate the contents of the Decree, as well as the function and general principles of the Model;
- II. “*The Organizational and Management Model of Lombardi Ingegneria S.r.l.*” – a section aimed at specifying the foundational elements and contents of the Model adopted by Lombardi Ingegneria, with the objective of regulating conduct in order to prevent the commission of the various types of offences provided for by the Decree, with particular reference to the activities falling within the Company’s corporate purpose. The Model is divided into two sections:

The following documents form an integral part of the Model:

- the Code of Ethics;
- the list of offences and administrative violations under Legislative Decree No. 231 of 2001 (*annex 1*);

as well as the following corporate documents:

- the corporate organizational charts;
- the system of powers (in particular, powers of attorney and delegations granted by the administrative body);
- the corporate procedures framework;
- the information flow scheme toward the Supervisory Body (*annex 2*);
- the compliance framework for contractual clauses relevant under Legislative Decree No. 231 of 2001 and Whistleblowing (*Annex 3*);
- the Organizational Act adopted in relation to *Whistleblowing* (*Legislative Decree no. 24/2023 – annex 4*).

Pursuant to Article 6, paragraph 3, of Legislative Decree No. 231 of 2001, the Model may be adopted based on codes of conduct drawn up by representative associations of entities and submitted to the Ministry of Justice, which, in agreement with the competent Ministries, may issue comments on the suitability of the models to prevent offences within thirty days.

Preparing its Model, Lombardi Ingegneria S.r.l. based the preparation of the Model on the Guidelines issued by Confindustria, updated in June 2021.

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4. RECIPIENTS

The rules contained in the Model are binding for the shareholders, the administrative body, and for all those who, even de facto, hold functions of representation, management, administration, direction, or control within the Company. They are also binding for the Company's employees (meaning all individuals who have an employment relationship with the Company, including managerial staff), as well as for those who, while not being part of the Company, act on its behalf and are subject to the direction or supervision of the Company's upper management.

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SECTION ONE: LEGISLATIVE DECREE NO. 231 OF 2001

5. ADMINISTRATIVE LIABILITY OF LEGAL ENTITIES, COMPANIES, AND ASSOCIATIONS

Legislative Decree No. 231 of June 8, 2001, titled “*Regulations on the administrative liability of legal entities, companies and associations, including those without legal personality*”, entered into force on July 4, 2001, in implementation of Article 11 of Enabling act No. 300 of September 29, 2000. It introduced into the national legal system – in line with European directives – the concept of administrative liability of entities, where “entities” refers to commercial companies, corporations, partnerships, and associations, even those without legal personality.

This liability, although defined by the legislator as “administrative” and even involving sanctions of administrative nature, has the essential characteristics of criminal liability, as it arises from the commission of criminal offences, is established through a criminal proceeding, and grants the Company the same procedural safeguards as those granted to individuals under investigation or accused of criminal trials.

An entity’s administrative liability arises when one of the predicate offences or unlawful acts (see § 6) is committed in its interest or to its advantage by one of the Recipients of this Model, who are classified according to their roles as follows:

- i. upper management personnel: natural persons who hold functions of representation, administration, or management of the entity or of an organizational unit with financial and functional autonomy, as well as individuals who, even de facto, manage or control it;
- ii. subordinate personnel: natural persons under the direction or supervision of one of the aforementioned individuals.

As for the concepts of interest or advantage, they can be defined as follows:

- there is an interest of the entity when the individual acts with the intent of benefiting the entity, regardless of whether such benefit is actually achieved. The presence of a concurrent personal interest of the offender does not exclude the entity’s interest;
- there is an advantage for the entity when, even without the intent to benefit it, the offender’s conduct results in any kind of benefit for the entity¹.

¹ The inclusion among the predicate offences of negligent crimes relating to health and safety at work (Article 25-septies) and environmental crimes (Article 25-undecies) raised an issue of logical compatibility between the absence of intent inherent to negligent crimes and the purposive element underlying the concept of the entity’s “interest”. On this point, the Italian Supreme Court, Joint Sections, in judgment no. 38343 of 24 April 2014, issued in the proceedings concerning the tragic fire at the ThyssenKrupp steel plant in Turin, clarified that “*in negligent offenses resulting in harm, the concepts of interest and advantage must necessarily be referred to the conduct, not to the unlawful outcome.*” The Court explained that this interpretative solution “*does not pose any logical difficulty: it is entirely possible that conduct characterized by the breach of precautionary regulations*”

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The entity shall be exempt from liability, if the individuals involved acted exclusively in their own interest or in the interest of third parties.

The administrative liability of the entity also applies in cases where one of the offenses remains in the form of an attempt.

Liability under Legislative Decree No. 231 of 2001 applies in addition to the criminal liability of the natural person who committed the offense.

The entity's liability exists even if the perpetrator of the offense is not identified or he/she is not prosecutable, as well as in cases where the offense is extinguished for reasons other than amnesty.

In addition to the circumstances described above, Legislative Decree No. 231 of 2001 also requires the establishment of the entity's culpability in order to assert its liability. This requirement refers to a "*fault in organization*", meaning the entity's failure to adopt adequate precautionary measures to prevent the commission of the offenses listed in the following paragraph, by the individuals identified in the Decree.

The administrative sanctions applicable to entities, if liability is established, are as follows:

- monetary fine: it applies whenever the entity is found liable, through a system based on "units", which takes into account, on one hand, the seriousness of the offense, the degree of the entity's responsibility, and the actions taken to eliminate or mitigate the consequences of the act and to prevent further offenses, and on the other hand, the entity's economic conditions;
- disqualifying sanction: it applies only in relation to offenses that expressly provide for it, and may consist of:
 - a. disqualification from conducting business activities;
 - b. suspension or revocation of authorizations, licenses, or permits functional to the commission of the offense;
 - c. prohibition from contracting with the public administration (except for obtaining public services);
 - d. exclusion from benefits, funding, grants, or subsidies, and possible revocation of those already granted;
 - e. prohibition on advertising goods or services;

and therefore negligent — may be carried out in the interest of the entity or result, in any case, in the achievement of an advantage. [...] This interpretative approach merely adapts the original attribution criteria to the changed regulatory framework, without altering the criteria of liability. The adjustment concerns only the object of the evaluation, which focuses no longer on the event, but solely on the conduct, in line with the different configuration of the offence. [...] It is entirely possible that the agent consciously violates the precautionary rule or even foresees the potential harmful outcome without intending it, to pursue aims aligned with the entity's strategies."

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- confiscation (of the price or profit from the offense): it is always ordered by the conviction ruling, except for the portion that can be returned to the injured party. There is also a specific provision for the confiscation of profits even in the absence of a conviction, when the predicate offense has been committed by a senior manager;
- publication of the judgment: it may be ordered when a disqualifying sanction is applied to the entity.

Legislative Decree No. 231 of 2001 also highlights that, when the conditions for the application of a disqualifying sanction involving the suspension of the entity's activity are met, the judge may, instead of applying such sanction, order the continuation of the activity under the supervision of a court-appointed commissioner, pursuant to Article 15 of Legislative Decree No. 231 of 2001, who is appointed for a period equal to the duration of the disqualifying sanction that would have been applied, when at least one of the following conditions is met:

- the entity performs a public service or a service of public necessity, the interruption of which could cause serious harm to the community;
- the interruption of the activity could have significant repercussions on employment, considering the size of the entity and the conditions of the local area in which it operates;
- the activity is carried out in industrial plants or parts thereof that have been declared of national strategic interest pursuant to Article 1 of Decree-Law No. 207 of December 3, 2012, converted, with amendments, by Law No. 231 of December 24, 2012.

6. THE OFFENSES AND UNLAWFUL ACTS THAT DETERMINE THE ENTITY'S ADMINISTRATIVE LIABILITY

The offenses currently capable of determine the Company's liability under Legislative Decree No. 231 of 2001 include:

- undue receipt of funds, fraud to the detriment of the State, a public body, or the European Union, or aimed at obtaining public funds, cyber fraud against the State or a public body, and fraud in public supply contracts (article No. 24 of the Decree);
- cybercrimes and unlawful data processing (article No. 24-*bis* of the Decree);
- organized crime offenses (article No. 24-*ter* of the Decree);
- embezzlement, misappropriation of public funds or movable property, extortion, undue inducement to give or promise benefits and corruption (article No. 25 of the Decree);
- counterfeiting of currency, public credit cards, revenue stamps, and instruments or identification marks (article No. 25-*bis* of the Decree);
- offenses against industry and commerce (article No. 25-*bis*.1 of the Decree);

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- corporate crimes (article No. 25-*ter* of the Decree);
- Crimes with purpose of terrorism or subversion of the democratic order (article No. 25-*quarter* of the Decree);
- practices of female genital mutilation (article No. 25-*quater*.1 of the Decree);
- crimes against individual personality (article No. 25-*quinqüies* of the Decree);
- market abuse and related administrative offenses (Article 25-*sexies* of the Decree);
- manslaughter and serious or very serious physical injury committed in violation of occupational health and safety regulations (article No. 25-*septies* of the Decree);
- receiving, money laundering, use of money, goods or assets of illicit origin, and self-laundering (article No. 25-*octies* of the Decree);
- crimes related to payment instruments other than cash (article No. 25-*octies*.1 of the Decree);
- offenses concerning copyright violations (article No. 25-*nonies* of the Decree);
- crime of inducing someone not to make statements or to make false statements to the judicial authorities (article No. 25-*decies* of the Decree);
- environmental crimes (Article 25-*undecies* of the Decree);
- crime of employing third-country nationals whose stay is irregular and human trafficking (article No. 25-*duodecies* of the Decree);
- crimes motivated by racism and xenophobia (article No. 25-*terdecies* of the Decree);
- fraud in sports competitions, illegal gaming or betting activities, and gambling using prohibited devices (article No. 25-*quaterdecies* of the Decree);
- tax crimes (article No. 25-*quinqüiesdecies* of the Decree);
- smuggling (article No. 25-*sexiesdecies* of the Decree);
- crimes against cultural heritage (article No. 25-*septiesdecies* of the Decree);
- laundering of cultural assets and devastation and looting of cultural and landscape heritage (article No. 25-*octiesdecies* of the Decree);
- transnational crimes (article No. 10 of Law No. 146 of March 16, 2006);
- crimes related to the virgin olive oil supply chain (article No. 12 of Law No. 9 of January 14, 2013).

For a detailed description of each offense, please refer to **Annex 1** of this document.

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7. EFFECTIVE IMPLEMENTATION OF THE MODEL AS A POSSIBLE EXEMPTION FROM ADMINISTRATIVE LIABILITY

The attribution of a crime to the entity varies depending on the role held by the individual who committed the offense within the Company.

Where the offense is committed by a person in a top managing position, the liability of the entity is presumed. The entity may rebut this presumption if he/she can demonstrate that:

1. the governing body adopted and effectively implemented, prior to the commission of the offense, an organization, management, and control model suitable for preventing offenses of the kind that occurred;
2. the task of overseeing the functioning and observance of the model, as well as ensuring its updating, was entrusted to a body within the entity with autonomous powers of initiative and control;
3. the individuals who committed the offense acted by fraudulently circumventing the organization and management model;
4. there was no omitted or insufficient supervision by the body referred to in point 2.

In accordance with established case law, when the alleged perpetrator of the offense is identified by the Judicial Authority as the Company's legal representative *pro tempore*, the power to appoint the legal counsel of the entity in the related criminal proceedings under Legislative Decree No. 231 of 2001 is expressly conferred to the Board of Directors (excluding from the decision-making process the individual potentially involved in the investigation) or to another person with a specific power of attorney previously or specifically granted by the administrative body.

Conversely, when the offense is committed by a *subordinate* individual, the burden is on the prosecution to prove that the offense was made possible due to an organizational deficiency within the entity. Such an organization *deficiency* is excluded if the entity, prior to the offense, had adopted and effectively implemented an appropriate organization and management model.

The Model therefore plays a crucial role in preventing potential liability for the entity.

However, mere adoption of the Model is not sufficient to exempt the entity from liability; it is always necessary that the Model is also effectively and genuinely implemented.

For this reason, it is essential that the Model is respected by all Recipients and is regarded as a point of reference guiding the daily activities of all those operating on behalf of Lombardi Ingegneria S.r.l..

In order to ensure the effective and continuous adequacy of the Model, as well as compliance by all Recipients, the Company has established a Supervisory Body (hereinafter also "SB") specifically tasked with verifying compliance with the Model and overseeing any activities related to its updating.

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Lombardi Ingegneria S.r.l. allocates to the SB corporate resources in a number and value adequate to the responsibilities assigned and the expected (and reasonably achievable) results, in order to establish the general principles of an effective internal control system for areas relevant under Legislative Decree No. 231 of 2001, and in particular:

- verifiability and traceability of every operation relevant to Legislative Decree No. 231 of 2001;
- compliance with the principle of segregation of duties;
- definition of authorizing powers consistent with the responsibilities assigned.
- reports to the SB of information relevant to the performance of its control functions.

Lastly, pursuant to article No. 6, paragraph 2-*bis* of the Decree, as amended by Legislative Decree No. 24 of 2023, the Model must also include internal reporting channels, protection against retaliation and a disciplinary system (for more details, please refer to §§ 16 and 20).

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