



Governance

Governance Rules

The governance rules of a company represent the set of rules, procedures and principles that regulate the functioning and management of the company. They outline the ways in which the company is organised, the responsibilities of the administrative and control bodies, and the ethical and transparency principles that inspire it. These rules are usually defined in the company's fundamental documents, such as the articles of association, the code of ethics, the internal regulations and the guidelines for the board of directors and other management bodies.

231 MODEL

The regulation of "Liability of entities for administrative offenses resulting from crime" (legislative decree 8 June 2001 n. 231), in which Nooter Eriksen's Model 231 is based, provides that companies can be sanctioned, financially and/or or disqualifying, in relation to certain crimes committed or attempted - in Italy or abroad - in the interest or to the advantage of the company by persons holding functions of representation, administration or management of the Company or of one of its financially autonomous and functional units, as well as by persons who exercise, even de facto, its management and control (so-called subjects in top positions) and, finally, by persons subordinate to the management or supervision of the aforementioned.

At the same time as the adoption of Model 231, the relevant Supervisory Body was established with the task of supervising the effectiveness and adequacy of Model 231, reporting on its implementation to top management.



Whistleblowing -

In compliance with the provisions of Directive (EU) 2017/1373 and the related transposition laws, the Sarbanes - Oxley Act of 2002, the organisation, management and control models pursuant to Legislative Decree no. 231 of 2001 and the internal Anti-Corruption Regulatory Instruments, we have adopted a reporting management system which allows us to manage reports, even anonymous, received by Nooter Eriksen Srl.

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GDPR - Privacy

Pursuant to Regulation (EU) 2016/679 ("GDPR"), Nooter Eriksen Srl (hereinafter "Company" or the "Data Controller") provides below the information regarding the processing of employees' personal data.

