

Officine Meccaniche Navali e Fonderie San Giorgio del Porto S.p.A.

CODE OF ETHICS AND CONDUCT

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FOREWORD

Officine Meccaniche Navali e Fonderie San Giorgio del Porto S.p.A. (hereinafter “SGDP” or the “Company”) has always fostered a strong commitment to ethical behaviour in both its internal operations and external activities. Integrity in all relationships – whether within the organization or with external Stakeholders – is considered a core value that guides every action.

In line with this commitment, the Company has chosen to formalize and share the ethical principles and rules of conduct that have defined its relationships with employees and third parties since its founding. These principles continue to underpin the Company’s business activities.

These principles are set out in this Code of Ethics and Conduct (hereinafter referred to as the “Code of Ethics”), which the Company expects to be not only shared, embraced, and promoted voluntarily, but also strictly observed by all individuals working on behalf of SGDP or interacting with it in any capacity. To ensure compliance, the Company provides for disciplinary and contractual measures in the event of violations.

To promote full implementation and alignment with its values, this Code of Ethics is binding not only for SGDP as a single entity but also for all its subsidiaries (the “Group”), so as to complement and update any existing Codes of Ethics adopted by other companies within the Group.

1. GENERAL PRINCIPLES

SGDP is committed to upholding the following ethical principles in its operations and calls on everyone involved to embrace and apply them consistently.

SGDP operates in full compliance with applicable European, national, and international laws, firmly rejecting corruption and any form of unlawful conduct.

No actions that contravene applicable laws, this Code of Ethics, or internal regulations – whether committed by members of corporate governance bodies, company management, or any other Addressees in the course of their duties – can be considered justified, even if carried out in pursuit of the Company's interests. Such conduct may result in the application of disciplinary measures by the Company.

SGDP places fundamental importance on the delivery of professional services with diligence, competence, professionalism, and efficiency, ensuring high-quality standards in all relations with clients and Stakeholders.

The Company values and promotes impartiality in all internal and external relationships, recognising it as a cornerstone of ethical conduct.

SGDP is committed to protecting the individual, along with their values, rights, and intangible assets.

The Company also considers its image and reputation to be collective assets that must be safeguarded and enhanced. This is achieved through the widespread dissemination, sharing, and observance of the ethical and behavioural principles set forth in this Code.

1.1 Addressees of the Code of Ethics

The provisions of this Code of Ethics apply to all employees, directors, collaborators, Stakeholders, and any individuals who cooperate in the performance of SGDP's activities and the pursuit of its objectives. These individuals are hereinafter referred to as the "Addressees."

The term Stakeholders refers to individuals or entities directly or indirectly involved in SGDP's operations, who have an interest in the Company's decisions, strategic initiatives, or actions.

SGDP's principal Stakeholders (hereinafter also referred to as "Stakeholders") include, but are not limited to:

- Members of management and supervisory bodies
- Shareholders
- Employees and collaborators
- Other companies within the Group
- Customers
- Suppliers and business partners
- Financial institutions and rating agencies
- Competitors
- The scientific and academic communities
- Authorities and public institutions
- The general public and local communities
- Trade associations and labour unions
- Media organisations

All individuals engaged in any form of collaboration with SGDP are required to align their behaviour with the principles and rules set out in this Code of Ethics and must refrain from actions that conflict with its content.

Specifically, Addressees are expected to observe and comply with the principles of this Code, even when they are expressed as general guidelines for corporate conduct and not explicitly directed at individuals.

1.2 Values

The Code of Ethics is founded on core moral values that guide decision-making and underpin all operational activities. These values define the identity of SGDP and the Group, strengthening their commitment to excellence, sustainability, and responsible growth:

1. People

People are at the centre of every initiative from design to construction. Continuous training and a focus on the quality of working life foster a dynamic and collaborative environment, where professionals share ambitious goals and work together to achieve excellence.

2. Quality, Research, and Innovation

Quality is a daily pursuit, built through perseverance and dedication. By investing in advanced training and the development of innovative solutions, SGDP contributes to shaping the future of shipbuilding, delivering excellence in every project and ship built.

3. Safety and Environmental Sustainability

The safety of individuals and the protection of the environment are fundamental pillars of the Group's identity. A century-long tradition rooted in the territory reflects a deep commitment to combining industrial activity with environmental stewardship, ensuring the wellbeing of employees, communities, and the ecosystems in which the Group operates.

4. Customer Focus

Customers are at the core of the Group's operations. The goal is to provide top-tier design and support services, responding with precision and timeliness to the needs of the maritime sector—one of the driving forces of the Italian economy.

1.3 Implementation of the Code of Ethics

The Code of Ethics (including any subsequent updates) is made available to all Addressees. All individuals collaborating with the Company are required to adhere to, and promote compliance with, the principles outlined in this Code. Under no circumstances may actions

taken in the interest of the Company justify behaviour that conflicts with the law or with the principles established herein.

Compliance with the rules set out in this Code is considered an essential part of the contractual obligations of all Addressees, in accordance with applicable law. Any violation of these principles may constitute a breach of contractual duties arising from an employment or collaboration relationship.

Whistleblowers acting in good faith are protected against any form of retaliation, discrimination, or penalisation—whether direct or indirect—that may result from their report. Confidentiality regarding the identity of the whistleblower will be preserved, in compliance with legal requirements and the rights of the Company and any individuals wrongly accused through malicious or grossly negligent reports.

The Company's disciplinary system includes provisions for sanctions against individuals who violate whistleblower protection measures, as well as those who submit reports with dishonest intent or with serious negligence.

Any discriminatory actions taken against whistleblowers may be reported to the National Labour Inspectorate, either by the whistleblower or by the trade union organisation designated by them, for appropriate measures within the Inspectorate's remit.

The Company considers compliance with the rules and principles contained in this Code of Ethics to be an integral and essential part of contractual obligations, including those under Article 2104 of the Italian Civil Code for employees, and under relevant contractual provisions for external collaborators.

Violations of these rules shall constitute a breach of the obligations arising from the employment or other collaboration relationship and consequently may result in legal or contractual consequences.

2. PRINCIPLES IN RELATIONS WITH ADDRESSEES AND THIRD PARTIES

2.1 Relations with Addressees

SGDP ensures the widest possible distribution of this Code of Ethics to all its Addressees.

The Company requires that all Addressees are familiar with and comply with the provisions of the Code of Ethics within the scope of their responsibilities. Furthermore, they are encouraged—within the limits of their roles—to promote awareness and application of the Code among third parties with whom they interact in the course of their duties.

Addressees are required to report to Company Management any breaches of the Code of Ethics they become aware of, whether committed by colleagues, collaborators, or consultants: any malicious or knowingly false report made to harm colleagues or collaborators will be considered a disciplinary offence.

SGDP upholds full respect for individuals and for current labour regulations. The Company explicitly condemns all forms of irregular, child, and forced labour, and is committed to creating and maintaining a working environment that fully respects the dignity and rights of each person. It actively opposes any form of discrimination based on gender, race or ethnicity, nationality, age, political opinion, religious belief, health status, sexual orientation, or socio-economic background.

Personal attacks, verbal abuse, insinuations of a personal nature, harassment, and any offensive or defamatory conduct toward colleagues—in any form—are strictly prohibited and subject to disciplinary action.

Under no circumstances is it permitted to offer or promise money or other benefits to representatives or employees of third parties (or individuals close to them) with whom the Company maintains business relations, with the intention of promoting or securing undue advantage for the Company. Any Addressee who receives requests or instructions to act in such a manner must immediately report the matter to the appropriate bodies.

2.2 Conflicts of Interest

We are all expected to carry out our activities with impartiality and in the best interest of the SGDP Group. In particular:

- Everyone must refrain from engaging in any conduct or external activities that may create a conflict of interest with those of the Group.
- Everyone is required to avoid taking personal advantage—either directly or through family members or third parties—of business opportunities that come to our attention in the course of our duties.

2.3 Competition

SGDP is committed to upholding the principles of fair competition, avoiding collusive practices, predatory behaviour, and any abuse of a dominant position.

In its dealings with customers and suppliers, SGDP pledges to comply with national and international competition laws and to operate in the marketplace based solely on the quality of its products and services. Accordingly, all Addressees are required to fully adhere to these principles in the performance of their duties and responsibilities.

SGDP rejects all forms of unfair competition and is committed to actively distancing itself from any inappropriate or unlawful conduct by third parties. It expects the same level of integrity from all Addressees in promoting and protecting fair competition.

2.4 Customer Relations

In line with the principles of this Code of Ethics, SGDP is strongly dedicated to meeting customer needs and is committed to maintaining high standards of quality.

The Company's primary objective is to establish and nurture relationships with customers based on fairness, transparency, efficiency, and mutual respect for ethical values.

SGDP ensures that all negotiations and business dealings with customers and clients are conducted with the utmost integrity, legality, and professionalism, in full compliance with applicable laws. Furthermore, the Company is committed to safeguarding the confidentiality, security, and protection of customer information, and refrains from disclosing any financial or other sensitive data, except where required by law.

2.5 Relations with Suppliers, Collaborators, and Consultants

In conducting its business and managing relationships with suppliers, SGDP strictly adheres to applicable laws, the principles set out in this Code of Ethics, and internal procedures—and expects the same from all Addressees.

When procuring goods or services, SGDP operates in full compliance with legal requirements, the values of this Code, and established internal protocols. Supplier selection and the management of related relationships must be based on principles of impartiality, transparency, and fairness. Any violation of these principles must be promptly reported to the Company.

SGDP requires its suppliers to be familiar with and committed to the principles of this Code of Ethics, fostering a supply chain aligned with the Group's core values. In particular, the Company seeks out partners who demonstrate high standards in areas such as human rights, environmental protection, and workplace health and safety.

Similarly, collaborators and consultants are selected based on impartiality, autonomy, and independent judgment.

Any conduct that breaches the principles of this Code may be regarded by the Company as a serious violation of the obligations of fairness and good faith, potentially constituting a breach of trust and just cause for termination of the contractual relationship.

In dealings with suppliers, collaborators, and consultants, SGDP—and any third parties acting on its behalf—must not attempt to improperly influence decisions for the purpose of obtaining

actions that violate duties of office or loyalty. Specifically, it is strictly prohibited to offer or promise, directly or indirectly, gifts, money, favours, or benefits of any kind.

2.6 Relations with the Public Administration and Bodies of Public Interest

In its dealings with public administrations, bodies providing public services, or operating in the public interest, SGDP strictly complies with all applicable EU, national, and internal company regulations.

All negotiations, commitments, and interactions of any kind with public administrations or public-interest bodies are exclusively managed by those corporate functions specifically appointed and/or authorised to do so.

In these relations, Addressees must refrain from any conduct that could improperly influence the decisions of the public body involved. Specifically, it is strictly prohibited to offer or promise, directly or indirectly, gifts, money, favours, or any kind of benefit in order to secure actions that are unlawful or contrary to official duties.

2.7 Relations with Supervisory and Control Authorities

SGDP maintains its relations with Supervisory and Control Authorities with the utmost transparency and cooperation, fully respecting their institutional roles and promptly complying with any instructions or requirements they issue.

SGDP expects all Addressees to demonstrate full cooperation and availability when dealing with public officials—or equivalent authorities—tasked with conducting inspections or audits of the Company's activities.

It is strictly prohibited to destroy or alter records, minutes, accounts, or any other documents, to make false statements, or to mislead the competent authorities in any way. Likewise, no one shall attempt to influence others to provide false or misleading information during such inspections or investigations.

3. RELATIONSHIP WITH EMPLOYEES

3.1 General principles

SGDP recognises that its personnel are a fundamental asset and a key driver of the Company's success.

The Company is committed to safeguarding and enhancing the value of its human resources, with the goal of preserving and developing the professional expertise of each employee. It strives to ensure that the skills and legitimate aspirations of individuals are fully realised in alignment with company objectives.

SGDP guarantees equal employment opportunities for all employees, basing decisions on professional qualifications and performance, without any form of discrimination. Employment is formalised through regular contracts; under no circumstances will irregular working relationships be tolerated. It is strictly prohibited to hire foreign nationals who do not hold valid residency permits.

Discrimination of any kind—whether based on union affiliation, political or religious beliefs, race, ethnicity, language, nationality, gender, age, economic condition, or health status—is not accepted.

All decisions related to human resources management, including access to roles or assignments, are made solely on the basis of merit, competence, and professionalism.

SGDP is dedicated to fostering personal development and growth, ensuring a safe and respectful work environment that upholds physical and moral integrity, personal dignity, and compliance with legal and environmental standards.

In light of evolving regulations, SGDP also pays particular attention, in its role as client, to ensuring proper standards are upheld throughout its supply chain, especially in relation to contracting and subcontracting practices, with a focus on protecting the dignity and safety of all involved parties.

The Company is committed to protecting the privacy of its employees in accordance with applicable regulations, and will not share or disclose personal data without the individual's consent, except where required by law.

SGDP views training as a key tool for personal enrichment, the dissemination of ethical values, and the reinforcement of corporate identity. It is also seen as a catalyst for innovation and change.

Employees are expected to maintain the highest standards of ethical, legal, and professional conduct, building and strengthening mutual trust.

In particular, employees are expected to:

- always act in accordance with the principles, values, and rules set out in this Code;
- fully comply with all applicable laws in the jurisdictions where SGDP operates.

Should an employee wish to accept any external responsibilities—such as consulting roles or appointments to Boards of Directors, Boards of Statutory Auditors, committees, or other working groups—prior written approval must be obtained from SGDP.

3.2 Working Environment and Anti-Discrimination

SGDP is committed to upholding respect for individuals and to fostering a strong culture of health, safety, and personal integrity in the workplace. This commitment is reflected in the Company's ongoing efforts to raise awareness of workplace risks and to encourage responsible behaviour among all Addressees.

SGDP actively works to preserve the health and safety of its employees and all relevant Stakeholders, placing particular emphasis on preventive actions that are clearly and transparently communicated. At the same time, the Company is committed to the continuous improvement of its operational structures and processes.

Addressees are expected to contribute to maintaining a safe, healthy, and respectful work environment. This includes taking part in risk prevention and environmental protection activities and ensuring the wellbeing of themselves, their colleagues, and any third parties, by adhering to applicable safety regulations and promptly reporting any situation that may pose a threat.

The following behaviours will be considered a deliberate assumption of risk and a violation of workplace safety standards:

- Reporting to work while under the influence of alcohol, drugs, or other substances with similar effects;
- Possession, consumption, or disposal of drugs for any reason during working hours.

Based on general principles and applicable national and international labour standards, SGDP is committed to fostering each employee's professional development and full potential. The creation of a respectful and inclusive working environment is a shared responsibility, requiring the active engagement of all employees.

In collaboration with all Group companies, SGDP strictly prohibits any conduct, decision, or evaluation based on discriminatory grounds, including political or trade union affiliation, religion, nationality, age, gender, sexual orientation, health condition, or any other physical or personal characteristic.

SGDP rejects all forms of harassment, discrimination, and abuse, and expects all Addressees to uphold this principle fully. The Company also firmly opposes the exploitation of child or forced labour in any form and in any country in which it operates.

Any violation—or suspected violation—of this section of the Code must be promptly reported to the Human Resources Department, which will conduct the appropriate investigation and, if necessary, apply the relevant disciplinary measures.

3.3 Working Hours and Remuneration

SGDP complies with all applicable laws, collective labour agreements (where applicable), and industry standards governing working hours, rest periods, and public holidays in the countries where it operates.

The standard workweek, excluding overtime, adheres to the limits established by local legislation. Overtime, when applicable, must be managed in accordance with legal provisions and fair labour practices.

Employee remuneration is aligned with the duties and responsibilities outlined in the employment contract. SGDP upholds the right of all personnel to receive a fair and decent wage. Salaries for a standard workweek—excluding overtime—shall meet or exceed the legal minimum, industry benchmarks, or provisions set by collective agreements, where applicable.

SGDP ensures that salary components, including benefits and allowances, are clearly itemised and regularly communicated in writing for each pay period. The Company is also committed to ensuring that wages and benefits are paid accurately and in full compliance with applicable laws.

3.4 Respect for and Protection of Company Assets

Each employee is responsible for the proper use, care, and protection of the assets and tools entrusted to them for the performance of their duties and is expected to actively contribute to safeguarding all company property.

Employees must comply with SGDP's operational and safety procedures when using company assets, ensuring they are handled correctly and preserved in good condition.

All Addressees are expected to act diligently and responsibly in the use of corporate resources, avoiding any misuse or behaviour that could damage, waste, or compromise the functionality or security of such assets.

The use of company property for purposes unrelated to professional duties, or in ways that conflict with the interests of SGDP, is strictly prohibited.

3.5 Freedom of Association and the Right to Collective Bargaining

SGDP fully guarantees all personnel the right to form, join, and participate in trade unions or workers' organisations of their choice, including for the purpose of engaging in collective bargaining with the Company. Employees may freely exercise this right without fear of adverse consequences or retaliation.

SGDP is committed to maintaining a neutral stance and will not interfere in the establishment, operation, or administration of these organisations, nor in the collective bargaining process.

The Company ensures that trade union members, workers' representatives, and employees involved in organising activities are protected from discrimination, harassment, intimidation, or retaliation due to their role. SGDP also guarantees these representatives the ability to communicate with their members within the workplace.

In countries where freedom of association and collective bargaining are restricted by law, SGDP will respect local legislation while ensuring workers have the opportunity to freely elect their own representatives.

3.6 Disciplinary Practices

SGDP is committed to treating all personnel with dignity and respect in every aspect of the employment relationship.

The Company strictly rejects any form of harsh, degrading, or inhumane treatment, including physical punishment, psychological or verbal abuse, and any form of coercion or intimidation. SGDP expects the same uncompromising commitment from all Addressees—especially employees, collaborators, and suppliers—across all countries in which it operates.

4. PRINCIPLES AND RELATIONS WITH THE COMMUNITY

4.1 Environmental Policy

SGDP places the highest importance on respecting the interests of the broader community and regards the environment and natural resources as fundamental values and a shared heritage that must be protected and preserved. The Company is committed to adopting responsible practices to safeguard the environment, strictly complying with all applicable environmental regulations, the conditions set by relevant permits, and the directives issued by competent authorities, while actively avoiding any conduct that could harm the environment.

SGDP promotes environmental stewardship as a core and distinctive element of its identity. It strives to align its activities with these principles, ensuring the responsible and efficient use of natural resources.

The Company closely monitors developments in environmental legislation and is committed to managing significant local projects with a focus on continuous improvement, aiming to reduce the environmental impact of its operations wherever possible.

4.2 Local Communities

SGDP is committed to contributing positively to the development of the local communities in which it operates. This commitment goes beyond compliance with environmental and safety regulations, extending to the active promotion of social responsibility initiatives. The Group supports and implements projects aimed at improving quality of life in the local area, fostering collaboration with communities, and generating a lasting and positive impact.

4.3 Trade Union Organisations

SGDP does not make contributions of any kind—whether directly or indirectly—to trade union organisations, their representatives, or candidates, except as permitted and in accordance with the provisions of applicable laws and regulations.

4.4 Next Gen

SGDP considers it essential to invest in the education and empowerment of the new generations, who will be responsible for addressing the challenges of the future. The Company recognises that a sustainable future is only possible by laying solid foundations for fair, inclusive, and lasting development.

To this end, SGDP:

- a) aligns itself with the path outlined by national and international bodies through the pursuit of the objectives set out in the 2030 Agenda;
- b) believes that the cultural and professional training of younger generations is essential to achieving the highest standards of safety and efficiency, as well as fostering individual growth on both a personal and professional level;
- c) supports the removal of social, economic, and cultural barriers that prevent young people from fully realising their potential and from contributing to new ideas and solutions for civil society;
- d) promotes the exchange of experiences and perspectives within the Group, encouraging the integration of young professionals who represent the future of the organisation.

4.5 The Press and Other Mass Media

SGDP communicates with the press and other mass media exclusively through its designated corporate bodies and authorised functions. These interactions are conducted with the utmost fairness, openness, and transparency, in line with the Company's established communication policy.

5. PRINCIPLES IN ACCOUNTING AND FINANCIAL ACTIVITIES

5.1 Accounting Records

SGDP adheres to principles of accurate, complete, and transparent accounting in line with applicable legal requirements and prevailing accounting standards.

When recording transactions related to company operations, Addressees must strictly comply with all relevant laws and internal procedures to ensure that each entry is properly documented, legitimate, verifiable, consistent, and appropriate.

Addressees are also expected to maintain a fair and transparent relationship with the Board of Statutory Auditors and the External Auditing Firm, offering full cooperation during audits and avoiding any form of undue influence that could compromise their professional judgment

5.2 Anti-Money Laundering

The Company conducts its business in full compliance with applicable anti-money laundering laws and the provisions issued by the relevant authorities. To this end, it is committed to operating in accordance with the principles of integrity, transparency, and due diligence.

Business relationships with commercial counterparties, suppliers, partners, collaborators, and consultants are established only after verifying their reputation and the legitimacy of their activities. This is to prevent any involvement—whether direct or indirect—in transactions that could facilitate the laundering of funds derived from unlawful or criminal activities.

All activities are carried out in full compliance with internal control procedures and applicable anti-money laundering regulations.

5.3 Gifts and Entertainment Expenses

SGDP allows Addressees to offer gifts or tokens of modest value, provided they comply with the procedures and/or commercial policies adopted by the Company.

Hospitality or entertainment expenses may be incurred only when they fall within the bounds of standard business courtesy and do not compromise or influence the independent judgment of the recipient.

In dealings with customers, suppliers, or other Stakeholders encountered for professional purposes, members of top management and employees may only accept gifts of symbolic value. Any SGDP stakeholder who receives gifts or benefits outside the permitted scope must notify the Company's Human Resources Department, which will assess their appropriateness and determine any necessary actions.

6. PRINCIPLES FOR THE PROCESSING OF DATA AND INFORMATION

6.1 Protection of Privacy

SGDP is committed to safeguarding the confidentiality and privacy of all information and data collected during or in connection with the performance of its activities. All Addressees are required to comply strictly with these principles.

SGDP adheres to applicable data protection laws and regulations, in particular EU Regulation 2016/679 (General Data Protection Regulation – GDPR), as implemented in Italy by Legislative Decree No. 101 of 10 August 2018, as amended.

6.2 Management of Confidential Information

Any person who, in the course of their duties, becomes aware of confidential, sensitive, or privileged information is bound to maintain its confidentiality.

The disclosure of such information outside the organisation may only be carried out by individuals expressly authorised to do so, in accordance with the Company's internal procedures, applicable legal provisions, and in full respect of the principles of equal treatment and timely dissemination.

6.3 Information Systems

SGDP is committed to fostering digitalisation and technological innovation in a responsible and ethical manner, ensuring operational transparency and the protection of sensitive data. The Company promotes the compliant and ethical use of emerging digital technologies—including artificial intelligence, big data, and automated processes—in full compliance with privacy regulations and fundamental human rights.

SGDP operates in accordance with all applicable laws governing the use and management of information systems, and all Addressees are required to observe these regulations.

Under no circumstances may IT and network resources be used for purposes that are unlawful, contrary to public order or decency, or that involve the commission or facilitation of criminal activities. This includes actions aimed at damaging or altering the information systems or data of third parties (whether private individuals or public bodies), or unlawfully obtaining confidential information.

Furthermore, Addressees are not permitted to make audiovisual, electronic, paper-based or photographic recordings or reproductions of company documents, unless such activities are expressly authorised or form an integral part of the responsibilities assigned to them.

7. PRINCIPLES FOR OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT

SGDP considers the protection of health and safety in the workplace a top priority. The Company not only complies with all applicable occupational health and safety regulations but also actively works to improve working conditions through continuous prevention and enhancement efforts.

All activities are carried out under technical, organisational, and economic conditions that ensure effective accident prevention and the creation of a safe and healthy working environment.

Every Addressee is expected to exercise the utmost diligence in performing their duties, strictly adhering to all established safety protocols and preventive measures to minimise risks to themselves, their colleagues, and others present in the workplace.

Each individual shares responsibility for maintaining a safe environment and must act with care to prevent accidents and safeguard the wellbeing of co-workers.

Furthermore, all Addressees are required to comply with the instructions and guidelines issued by those individuals within the Company who are tasked with fulfilling health and safety responsibilities.

8. CONTRACTUAL VALUE

This Code of Ethics is an integral part of the professional relationship established with SGDP.

For employees, compliance with the provisions of this Code constitutes an essential element of their contractual obligations. Any violation may be deemed a breach of the fundamental duties arising from the employment relationship or a disciplinary offence, and may lead to disciplinary measures, including potential termination of employment, as well as liability for any resulting damages.

For non-employee Addressees, compliance with the Code of Ethics is a fundamental condition for entering into and maintaining any professional or collaborative relationship with the Company.

Any violation of the Code's provisions will be sanctioned in accordance with the applicable contractual terms and may give rise to claims for compensation for damages suffered by SGDP as a result of such violations.

9. SUPERVISION OF THE APPLICATION OF THE CODE OF ETHICS AND CONSEQUENCES OF ITS VIOLATION

9.1 Supervision

In situations of uncertainty, each Addressee is encouraged to carry out a self-assessment by asking:

- Could the situation or conduct be considered unlawful or improper?
- Does the behaviour align with the principles of this Code and the Company's procedures?

If in doubt, Addressees are advised to seek guidance from their designated contact person or to submit a report through SGDP's whistleblowing channels.

All employees and collaborators are required to promptly report:

- any violation or suspected violation of this Code;
- any request or instruction to breach the Code, regardless of the source.

Reports should be detailed and include relevant information to enable the Company to make informed decisions about the facts described. SGDP guarantees that no retaliation will be tolerated against individuals who, in good faith, submit a report or cooperate in investigations related to this Code.

9.2 Consequences of Violating the Code of Ethics

Non-compliance with, or violation of, the conduct rules set out in this Code and related Company procedures constitutes a breach of the obligations arising from the Addressee's contractual relationship with SGDP.

The investigation of such breaches, the handling of any resulting disciplinary proceedings, and the imposition of sanctions fall under the responsibility of the designated and authorised corporate functions.