

GFM CODE OF ETHICS

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PREMISE

GFM SpA operates in the manufacturing and installation of high-precision mechanical components in the energy sector. In carrying out its activities, it must comply with the laws, regulations, and directives issued by various authorities, as well as all documents issued by any public authority that are binding on companies operating in the context they regulate.

The Code of Ethics specifies the corporate rules that GFM SpA undertakes to observe in carrying out its business activities, in its relationships with collaborators, customers, suppliers and partners, and with institutions and organizations.

GFM SpA operates in accordance with the principles of freedom, human dignity, and respect for diversity, eliminating any discrimination based on gender, race, language, personal and social conditions, religious beliefs, and political beliefs.

Likewise, GFM SpA places fundamental importance on the value of workplace safety, paying particular attention to worker training, the adoption and maintenance of personal protective equipment, as well as any other tools designed to protect the health and safety of workers.

GFM SpA also promotes environmental protection by avoiding pollution, waste, and other phenomena that could alter the ecosystem of the area in which it operates.

Given the size and importance of its operations, as well as its strategic role within the national manufacturing industry, GFM SpA intends to build its growth by consolidating a solid image, faithful to the values of fairness and loyalty, in every daily business process and in every relationship with institutions and customers.

To this end, GFM SpA fosters a work environment inspired by respect, fairness, and collaboration, as well as by the experience gained in its sectors of activity. This environment allows for the involvement and empowerment of managers, employees, and collaborators, with regard to the specific objectives to be achieved and the methods for pursuing them.

This Code, therefore, has been prepared with the aim, among other things, of clearly defining the set of values that GFM SpA recognizes, accepts and shares.

GFM SpA, including through the use of IT tools, is committed to maintaining an information and awareness program regarding the provisions of this Code of Ethics and its application to the entities to which it refers, so that employees, directors, and all those who work for GFM SpA carry out their activities and/or duties in constant compliance with the principles and values contained in this Code.

This Code is approved by the Administrative Body of GFM SpA.

Chapter I. General Provisions

Art.1 Scope of application and recipients

1. The principles and provisions of this Code of Ethics (hereinafter the "Code") constitute specific examples of the general obligations of diligence, correctness, and loyalty that characterize the fulfillment of work performances and behavior in the workplace, as well as the principles of transparency, efficiency, and good faith that guide the activities of GFM SpA, both towards its customers and towards institutions and its suppliers.
2. The principles and provisions of the Code are binding on the Directors, on all persons linked by employment relationships with GFM SpA ("employees") and on all those who work for GFM SpA, regardless of the relationship, even temporary, that binds them to the same ("collaborators"). The directors, employees and collaborators are hereinafter jointly referred to as "recipients".
3. The Code is brought to the attention of and must be expressly accepted by third parties who receive assignments from GFM SpA or who have stable or temporary relationships with it, using tools, including IT, that ensure effective knowledge of it.

Chapter II. General Principles

Art. 1 General principles

1. The Code contains and illustrates a set of principles whose observance is of fundamental importance for the proper functioning, the reliability of management and the image of GFM SpA. These principles are referred to in operations, behaviours and relationships, both internal and external to the company.
2. GFM SpA assigns a central role in the development and consolidation of its business to its human resources, whose management is based on respect for the personality and professionalism of each worker and collaborator, within the general framework of this legislation.

Art. 2 Responsibility and fairness

1. Each recipient of this Code undertakes to carry out their work activities and services with the utmost diligence, efficiency, and correctness, making the best use of company structures and tools and assuming the responsibilities associated with the obligations required by their roles.
2. All operations and activities carried out by each worker, collaborator, or manager within the company are oriented towards compliance with current regulations, internal procedures, and the general principle of good faith and fairness.
3. Recipients shall not use the information, goods or equipment at their disposal for personal purposes.
4. Each recipient, in carrying out their corporate duties, shall not accept or make, for themselves or others, suggestions, inducements, or reports that could cause harm to GFM SpA or undue advantages for themselves, the company, or third parties.
5. Each recipient, furthermore, rejects and does not make undue promises and/or offers of money or other benefits, with the sole exception of the possibility of making gifts of modest value (less than €100) on holidays or special occasions, without, in any case, obtaining any benefit.
6. If a third party makes an offer, other than commercial gifts or gifts of modest value, the recipient is obliged to promptly inform their superior or the person to whom they are required to report for appropriate action.
7. In any case, the pursuit of GFM SpA's interests can never justify conduct contrary to the principles of fairness and responsibility.

Art. 3 Diligence and loyalty

The recipients of this Code must work to promote the company's interests with diligence and loyalty, refraining from behavior that could compromise the company's good name or cause damage to its tangible and intangible assets.

Art. 4 Impartiality

In relations with all parties, each recipient avoids any discrimination based on age, ethnic origin, nationality, political opinions, religious beliefs, gender, or health status.

Art. 5 Confidentiality

All recipients of this Code and the Model pursuant to Legislative Decree 231/2001 are required to ensure maximum confidentiality regarding news and information regarding the activities, projects, information and data owned by the client, the production systems and the supplier network of GFM SpA, also enhancing the application of internal procedures.

Art. 6 Integrity

GFM SpA managers, employees, and collaborators undertake to act in a manner that does not compromise the integrity, image, and reputation of the company and its collaborators. Collaborators must also conduct their business in accordance with the requirements of fairness imposed by law and this Code.

Art. 7 Conflict of interest

1. In carrying out their duties and responsibilities, each recipient must always protect the general interests of GFM SpA.
2. Recipients must promptly and promptly notify their superior, or directly the Administrative Body (if the recipient is a manager), of any situations or activities in which they may have interests that conflict with those of GFM SpA.
3. Once the prior communication referred to in the previous paragraph has been made, the recipient will refrain from carrying out any acts or activities that could compromise the interests of GFM SpA and will comply with the subsequent decisions that, on this point, will be taken by the respondent.
4. In any case, GFM SpA works to avoid incurring situations of conflict of interest, whether real or even potential, including the case in which an employee acts to satisfy an interest other than that of the company and its shareholders, in order to gain a personal advantage .

Art. 8 Protection of health and the environment

1. GFM SpA guarantees working conditions that respect individual dignity, in safe and healthy work environments, since GFM SpA considers the physical and moral integrity of its people a primary and essential value. Company activities are conducted in compliance with the standards defined in the UNI INAIL Guidelines, as well as with the provisions of the internal company ISO regulations.

2. GFM SpA is committed to protecting the natural environment and ecosystem of the area in which it operates. For this reason, GFM SpA bases its decisions on ensuring compatibility between economic initiative and environmental needs.

Art. 9 Anti-money laundering

GFM SpA and its employees must never participate in operations that could result in the laundering of criminal or illicit proceeds in any form or manner. GFM SpA applies anti-money laundering regulations to all its operations and activities.

Art. 10 Training and updating of the recipients of the Code and the Model

GFM SpA is committed to providing all recipients with adequate training and ongoing refresher courses on the administrative liability of legal entities. Training and refresher courses may also be provided through IT tools, seminars, or company meetings.

Chapter III. Purpose of the Code of Ethics

The Code of Ethics represents a guide for all those who have relationships with the company, both internally and externally, and aims to:

- Promote a corporate culture based on ethics and integrity;
- Recognize the relevance and binding effectiveness of the ethical principles described below also in the context of crime prevention
- Define the values and guiding principles for stakeholder relationships
- Indicate the principles of conduct to which all recipients of the code are bound
- Prevent illicit behavior or behavior that is contrary to company values by providing sanctions proportionate to the seriousness of any violations committed.

GFM SpA is committed to complying with current regulations, ensuring transparency, fairness, and social responsibility in all its activities.

Chapter IV. Internal Control System

Art. 1 Principles of the internal control system

1. To facilitate greater efficiency and effectiveness of company operations, GFM SpA has established a control system, according to the methods and principles described in the following article.
2. The internal control system refers to the set of tools and processes adopted by GFM SpA and deemed appropriate to verify, manage, and improve the company's activities, including through collaboration on the following topics:
 - (a) updating and continuous improvement of the existing quality system;
 - (b) constant updating of company procedures and flows;
 - (c) correct management of GFM SpA;
 - (d) protection of company assets;
 - (e) selection and adoption of behaviors and processes that guarantee compliance with current legislation and that are compliant with internal regulations.

Art. 2 Operation of the internal control system

1. The internal control system carries out its function through periodic tests and planned internal audits of company activities with consequent reporting activity.
2. The internal control system carries out its function by reporting to all corporate bodies of GFM SpA.

Art. 3 Traceability of activities and documentation

To ensure the traceability of operations performed in carrying out its activities and providing services, GFM SpA systematically stores all documentation, including electronic formats. Each operation must be supported by accessible and verifiable documentary evidence.

Chapter V. Sustainability and environmental protection

GFM SpA has embarked on a journey to integrate ESG sustainability objectives into its corporate strategies and business models, focusing on three areas: environment, social, and governance.

Chapter VI. Relations with customers and suppliers

Art. 1 Contractual relationships with customers and suppliers

1. Commercial relationships between GFM SpA and its customers and suppliers are inspired by the principles of correctness, honesty, professionalism, transparency and maximum collaboration.
2. All contracts, regardless of their amount, are stipulated in writing and will be drafted, including in the form of business letters or electronic correspondence, in full compliance with applicable laws.
3. All economic relationships between GFM SpA and its customers and suppliers are inspired by the principle of traceability and, therefore, all payments are received and made using instruments that allow the perfect reconstruction of the economic relationship.

Art. 2 Respect for the principle of legality in relations with suppliers

1. GFM SpA prohibits maintaining commercial relations with individuals directly linked to criminal organizations or who, in any case, have been convicted of having acted, in the exercise of their commercial activities, in violation of criminal law provisions.
2. Should any anomaly be identified at any stage of the contractual relationship, including the negotiation phase, which could be indicative of a violation of criminal law provisions, the person responsible for handling the relationship will immediately report such anomaly to the Administrative Body and the Supervisory Body established pursuant to Legislative Decree 231/2001.
3. GFM SpA requires all suppliers to explicitly accept this Code of Ethics, which can also be made available to them via electronic means.

Chapter VII. Relations with collaborators

Art. 1 Employees

1. All GFM SpA employees are hired under regular employment contracts, and no form of irregular work or exploitation is tolerated.
2. At any stage of the employment relationship, including the selection stage, GFM SpA does not tolerate any form of discrimination and the professional profiles of candidates are evaluated exclusively for the purpose of satisfying the company's interests.
3. All personnel search and selection processes are conducted with respect for candidate privacy, ensuring equal opportunities, and without any discrimination.
4. In establishing and maintaining employment relationships, GFM SpA values training on the regulatory aspects of employment, including in relation to Legislative Decree 231/2001.
5. GFM SpA is committed to fully complying with workplace health and safety regulations, planning ongoing monitoring and prevention activities regarding risks associated with carrying out its institutional activities.

Art. 2 Technical update

GFM SpA ensures the training and continuing education of its employees, providing refresher and study tools and allowing participation in courses and seminars of proven professionalism.

Art. 3 Privacy Protection

The personal data of internal and external collaborators are processed by GFM SpA in full compliance with current legislation and in accordance with the Privacy Policy – Information on the Processing of Personal Data – EU Regulation 2016/679 (<http://www.gfm spa.com/pdf/PrivacyPolicyIT.pdf>).

Art. 4 Harassment or mobbing in the workplace

1. GFM SpA promotes initiatives aimed at creating working methods that achieve greater organizational well-being.
2. GFM SpA requires that internal and external work relationships be free from harassment or any behavior that may be considered mobbing. All practices, without exception, are prohibited. The following are considered to be prohibited:
 - create an intimidating, hostile, isolating or otherwise discriminatory work environment against individuals or groups of workers;
 - placing unjustified interference with the performance of another's work;
 - hindering the individual employment prospects of others for mere reasons of personal competitiveness or that of other employees.

3. Any form of violence or harassment, whether sexual or related to personal or cultural diversity, is prohibited. The following are considered such:
 - make any decision relevant to the recipient's working life dependent on the acceptance of sexual favors or on personal and cultural differences;
 - inducing one's collaborators to perform sexual favors through the influence of one's role;
 - propose private interpersonal relationships, despite an expressed or reasonably evident dislike;
 - allude to physical or mental disabilities and impairments or to forms of cultural, religious or sexual orientation diversity.

Art. 5 Relationships with collaborators

GFM SpA guarantees an inclusive, fair, and respectful work environment. Each employee is expected to perform their duties with loyalty, professionalism, and responsibility. Bullying, harassment, abuse of power, and any form of discrimination are prohibited. Continuous training and employee development are encouraged.

Art. 6 Abuse of alcohol or narcotics and smoking ban

1. GFM SpA employees are expected to personally contribute to promoting and maintaining a climate of mutual respect in the workplace; particular attention is paid to respecting the sensitivities of others.
2. Being or being under the influence of alcohol, narcotics, or similar substances during work and in the workplace will be considered a conscious risk of compromising these environmental characteristics. Chronic addictions, when they impact the work environment, will be treated as equivalent to the previous cases for contractual purposes. GFM SpA is committed to promoting the social initiatives provided for in this area by employment contracts.
3. It is expressly forbidden to:
 - possess, consume, offer or supply, for any reason, narcotic substances or substances with a similar effect, during the performance of work and in the workplace;
 - Smoking in the workplace. GFM SpA, when designating designated smoking areas, will take into particular consideration the needs of those who experience physical discomfort from the presence of smoke in workplace settings and request protection from secondhand smoke in their workplace.

Chapter VIII. Relations with other corporate bodies

The company's top management and the positions provided for by the Statute are required to fully comply with the provisions of the Statute, current national and EU legislation as well as the company's regulations and procedures .

Chapter IX. Relations with Supervisory and Control Authorities

GFM SpA is committed to fair and transparent conduct towards supervisory and control authorities, ensuring the availability of all necessary and required documentation to carry out their activities.

Internal and external employees and collaborators are prohibited from altering, falsifying, or making incomplete the requested information.

Chapter X. Relations with the mass media: external communications and information

GFM SpA is committed to managing its external communications following the principles of correctness, transparency and truth, promoting knowledge and consensus on corporate policies and the company's programs and projects.

Relations with the press and the media are maintained only by expressly authorised individuals and must respect ethical values, protecting minors and rejecting vulgar or offensive messages.

Employees and collaborators may not make communications without the written authorization of the company.

Chapter XI. Contributions and Sponsorships

GFM SpA may accept requests for contributions limited to proposals from non-profit organizations and associations or those of cultural or charitable value.

Sponsorship activities may concern social, environmental, sporting, entertainment, and artistic themes, and the authorization process is expressly governed by current internal protocols.

Chapter XII. Addressees

Art. 1 Conduct required of recipients

1. GFM SpA requires all recipients to conduct themselves in a manner that, under all circumstances, does not violate the provisions of Italian and European law, as well as those of the foreign country in which GFM SpA operates, and that applies the values and principles contained in this Code of Ethics and the Model pursuant to Legislative Decree 231/2001. In any case, GFM SpA cannot tolerate illegal conduct or conduct that violates this Code and will impose all appropriate disciplinary measures to sanction such violations.
2. Each recipient is required to perform their duties with decorum, professionalism, and respect for human dignity.
3. Each recipient must keep confidential information and documents with the utmost diligence and must comply with the company instructions and procedures established, also for the purposes of protecting confidentiality and privacy.

Art. 2 Use of company assets

1. Each recipient is responsible for the protection and preservation of the company assets assigned to them and is required to promptly inform the relevant departments of any damage or malfunction. Specifically, this obligation is outlined in the duties required by the application of workplace safety regulations.
2. Each recipient may use company assets only for business purposes and not for personal use. Upon termination or suspension, for any reason, of the professional relationship with GFM SpA, the recipient is required to return all assets provided for use.
3. When using company information systems, each recipient agrees not to install borrowed or unauthorized software and never to make unauthorized copies of licensed programs for personal, business, or third-party use.
4. Staff use IT systems within the limits and solely for the company's interests: each employee is responsible for the security of the systems used and is subject to applicable regulatory provisions and the terms of license agreements. Except as provided by civil and criminal law, misuse of company assets and resources includes the use of internet connections for purposes other than those related to employment or to send offensive messages or messages that could damage the company's image.
5. Staff are also required not to disclose their computer system access passwords and to exercise the utmost caution and commitment to prevent the possible commission of crimes through the use of IT tools.
6. Anyone who becomes aware of any alteration to the IT system or the data it manages must immediately notify company management and the Supervisory Body.
7. Following the submission of an expense report, reasonable, actual, and authorized expenses will be reimbursed, according to the rules set forth in the specific procedures. Receipts for goods and services must always be requested, and personal expenses must be separated from business expenses at all times.

Each recipient must maintain the confidentiality of confidential information and scrupulously observe the provisions of the company security policies, also to avoid compromising the functionality and protection of IT systems.

It is prohibited to use company assets for unauthorized personal purposes, unauthorized access to computer systems, or damage software or communications. In the event of intentional damage, the company reserves the right to seek compensation.

Art. 3 Dissemination of the Code

1. The Code of Ethics and its future updates are discussed and approved by the Administrative Body of GFM SpA.
2. Compliance with the provisions of the Code must be considered an essential part of the contractual obligations of all GFM SpA Persons pursuant to and for the purposes of applicable law.
3. The Code of Ethics is disseminated through publication on the official websites and intranets of individual companies and by posting it on their respective noticeboards.
4. All recipients of this Code have the right to obtain a paper or electronic copy of this document by simply making a request.

Art. 4 Compliance with the Code

1. All recipients are required to comply with all the provisions of this Code and of the Organization, Management and Control Model, drawn up pursuant to Legislative Decree 231/2001.
2. In the event of violations of the Code and/or the Model, GFM SpA, including through its Supervisory Body, will take disciplinary action against those responsible for the violations, in accordance with the provisions of collective agreements, individual roles, and the disciplinary code, which is an integral part of the Model.
3. Violation of the principles and contents of the Code may constitute a breach of the primary obligations of the employment relationship or a disciplinary offense, with all legal consequences, including those regarding the continuation of the employment relationship, and may result in compensation for any damages resulting therefrom.
4. Notification of the violation may take the form of a written complaint, even anonymous, or an independent investigation initiated by any internal body of GFM SpA.
5. Reports or violations of the Code must be promptly communicated to one's superior and to the Whistleblowing Officer via the link: <https://gfm.integrityline.com> or in writing, by regular mail, express courier, or registered mail, addressed to the Supervisory Board at Via Giulio Natta, 5 – 24030 Mapello (BG), marked "confidential and personal" without specifying the sender. The report in written form must be placed in two sealed envelopes, with the reporting person's identification data and an identity document in the first envelope; the subject of the report in the second; both envelopes must be placed in a third envelope marked "confidential for the Supervisory Board" on the outside;
6. Anyone wishing to make a verbal Report may do so via telephone or voice messaging at the following address: <https://gfm.integrityline.com> or by requesting a direct meeting with the Supervisory Body set no later than 7 days later by contacting the Supervisory Body through the platform: <https://gfm.integrityline.com>.
7. In the internal evaluation process and any disciplinary action, adversarial proceedings will be guaranteed, also in compliance with workers' rights.

Article 5 Revision of the Code

1. The revision of the Code is approved by the Board of Directors of GFM SpA, upon proposal of the CEO of GFM SpA, after consulting the Board of Statutory Auditors.
2. The proposal is formulated taking into account the stakeholders' assessment with reference to the principles and contents of the Code, also promoting their active contribution and the reporting of any shortcomings.

Chapter XIII. Relations with Public Institutions

Art. 1 General principles

In its relations with all institutions, GFM SpA bases its activities on the principles of fairness, transparency, collaboration, and non-interference, in the respective roles of the various institutions.

Art. 2 Public administrations

1. All relationships between GFM SpA and public institutions must be managed and regulated only by employees and authorized representatives.
2. In their relations with Public Administrations, all recipients of this Code shall uphold the principles set forth in the previous article and, in any case, avoid any conduct that might even give rise to doubts regarding possible collusive intent with Public Administration officials.
3. It is never permitted to pay or offer, directly or indirectly, payments, material benefits and other advantages of any kind to third parties, government representatives, public officials and public or private employees, to influence or compensate for an act of their office.

4. GFM SpA staff, as well as external collaborators whose actions may be attributable to GFM SpA, must conduct themselves with transparency, fairness, and traceability in their relationships with the Public Administration. Such relationships are reserved exclusively for the relevant functions and positions, in compliance with approved programs, company procedures, and existing delegations and/or powers of attorney.
5. It is forbidden to make, induce, or encourage false statements to the Authorities . Any behavior other than that defined in this Code of Ethics is not tolerated.
6. GFM SpA does not make direct or indirect contributions, in any form, to political parties, movements, committees, and organizations, or to their representatives and candidates.

Art. 3 Relations with political and trade union organizations

GFM SpA does not engage in direct or indirect pressure on political or trade union representatives. Involving the company for political, trade union, or electoral purposes is prohibited. All recipients must avoid behavior that could constitute undue interference or favoritism.

Chapter XIV. Antitrust Regulation

GFM SpA is committed to strictly complying with national and European competition regulations.

The company operates in compliance with antitrust regulations, promoting free competition and rejecting anti-competitive practices.

- Prohibition of anti-competitive practices
- Prohibition of abuse of a dominant position
- Collaboration with the authorities
- Internal supervision

Chapter XV. Commitment to the prevention and fight against corruption

GFM SpA is committed to preventing and combating all forms of corruption, whether active or passive.

Anti-corruption is guaranteed within the company by an appropriate policy with the following guidelines:

- prohibition of corrupt practices: any form of offer, promise, acceptance or request for money, goods, services or other undue advantages, aimed at influencing decisions or obtaining undue personal or corporate benefits, is considered prohibited.
- compliance with current regulations
- transparency in relationships
- adoption of preventive measures: the company implements internal procedures, controls and training activities to prevent and detect behaviors contrary to anti-corruption legislation and the principles of this code
- reporting of wrongdoing
- penalties for violations

Chapter XVI. Budgets and declarations

Art. 1 Criteria for preparing the financial statements and accounting records

1. Accounting transparency is based on the truthfulness , accuracy, and completeness of the underlying information for the relevant accounting records. Each member of the corporate bodies, management, and employee is required to collaborate, within their respective areas of expertise, to ensure that operating events are accurately and timely represented in the accounting records.
2. It is prohibited to engage in behaviors that could jeopardize the transparency and traceability of financial reporting.
3. For each operation, adequate supporting documentation of the activity carried out is kept in the records, so as to allow:
 - easy and timely accounting registration;
 - the identification of the different levels of responsibility and of the division and segregation of tasks;
 - the accurate reconstruction of the operation, also to reduce the probability of material or interpretative errors.
4. Each record must accurately reflect what is found in the supporting documentation. It is the responsibility of all GFM SpA personnel to ensure that the documentation is easily traceable and organized according to logical criteria.

5. GFM SpA's financial statements are prepared in compliance with the principles set forth in the Civil Code and tax regulations.
6. All persons responsible for preparing and drafting financial statements are required to diligently verify the accuracy of the data and information that will form the accounting basis for preparing the financial statements.
7. Directors are prohibited from engaging in any behavior that could harm the integrity of GFM SpA's corporate assets.
8. All recipients are prohibited from performing any simulated or fraudulent act capable of altering the corporate will, forming an irregular majority or resolution.
9. GFM SpA Personnel who become aware of omissions, falsifications, or negligence in accounting or the documentation on which the accounting records are based are required to report the facts to their superior, or to the body to which they belong, and to the Supervisory Body.

Chapter XVII. Supervisory Body

Art. 1 Supervisory Body

1. The Supervisory Body of GFM SpA is responsible for monitoring the regular and continuous application and compliance with this Code and the Model, pursuant to Legislative Decree 231/2001.
2. In carrying out the functions referred to in the previous paragraph, the Supervisory Body has full financial and operational autonomy. The Supervisory Body has full and independent investigative powers, allowing it to gather any information of any nature pertaining to the implementation of the Model and the Code.
3. The Supervisory Body, as an independent body within GFM SpA, is equipped, among other things, with the following powers:
 - to know all the company information flows;
 - to know all the financial movements that feed the various company functions;
 - to collect information of any nature, including from third parties, relating to any violation of this Code or the Model, protecting, where possible, the confidentiality of the source of information and guaranteeing anonymity, if disclosure of the source's identity could compromise the serenity of the company.
4. The Supervisory Body of GFM SpA monitors the adequacy and compliance with the Code and the Model, with the power to inform the respective Administrative Bodies of any shortcomings or inadequacies of the Code or the Model.
5. The Supervisory Body submits a half-yearly report to the Board of Statutory Auditors and the Board of Directors of GFM SpA on the implementation and any need for updating the Code and the activities carried out.
6. The Supervisory Body is assigned the task of:
 - promote and facilitate the implementation of the Code of Ethics and the issuance of reference procedures; report and propose to the Company's Administrative Body useful initiatives for the greater dissemination and knowledge of the Code, also with the aim of avoiding the repetition of ascertained violations;
 - promote knowledge of the Code of Ethics also through communication and specific training programs for the management and employees of GFM SpA ;
 - examine reports of possible violations of the Code, promoting the most appropriate checks; intervene, also upon reports from GFM SpA Personnel , in cases of reports of possible violations of the Code deemed not to have been duly addressed or of retaliation suffered by the Person following the reporting of news;
 - communicate to the competent structures the results of the checks relevant for the adoption of any disciplinary measures; inform the competent line/area structures of the results of the checks relevant for the adoption of appropriate measures.
7. Any information flow intended for the Supervisory Body can be addressed to GFM SpA: odv@gfmspa.com.