

ANTIMAFIA CODE OF CONDUCT

implemented by
AVR Group



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1. Nature and Purpose



The prevention of this risk serves a dual purpose:

- a.** protezione ed incremento dell'integrità aziendale, favorendo la creazione di valore economico per l'impresa;
- b.** contributo alla tutela dell'ordine pubblico economico ed alla difesa della legalità, favorendo la creazione di valore sociale per la comunità nel suo complesso.

The Antimafia Code considers all subjects involved in the company's operations: human resources, suppliers, customers, institutions, and other collective, territorial, or representative stakeholders. The Code establishes specific obligations for all employees, collaborators, consultants, and managers at any hierarchical level, both within the company and in external relations involving the company's interests. The Antimafia Code is widely disseminated, including through acknowledgment by suppliers and customers, and is published on the company's official website.

The adoption and implementation of the Antimafia Code are always subject to compliance with general or sector-specific regulations relevant to the company's activities and its relations with stakeholders (e.g., Workers' Statute, Privacy legislation, etc.).

2. Disclosure Obligations and Tools for Assessing Criminal Risk

The adoption of the Antimafia Code is based on AVR Group's assessment of the risk of criminal interference and infiltration within its business operations and the context in which it operates.

For this purpose, a territorial context analysis has been conducted—and must be continually updated—to identify and assess the risk that locally established criminal organizations may attempt to influence business activities to pursue unlawful advantages. As part of ongoing monitoring, AVR Group commits to maintaining a qualified dialogue with public authorities and relevant private organizations (e.g., prefects, police chiefs, law enforcement, mayors, business associations, labor unions, voluntary associations, universities) that possess specific expertise on criminal infiltration dynamics. This cooperation helps update risk indicators and evaluation criteria.

The information gathered will also be considered in the selection of stakeholders such as employees, collaborators, professionals, and suppliers.

Preventing criminal infiltration requires evaluating the reliability of all individuals or entities interacting with the company, using various indicators obtained from open sources, such as:

- a. Being subject to antimafia preventive measures (Legislative Decree 159/2011);
- b. Coercive precautionary measures or convictions (even if not final), including plea bargains, for crimes affecting professional reliability, especially offenses against the Public Administration, mafia-type association, usury, extortion, receiving stolen goods, money laundering, and similar crimes linked to organized crime;
- c. Similar measures or convictions against entities under Legislative Decree 231/2001 for crimes such as those mentioned above;
- d. Entities whose shareholders or managers are linked to individuals involved in the situations described above or who lack the qualifications for business activities;
- e. Entities suspected of existing solely to cover or assist members of criminal groups or evade regulatory prohibitions;
- f. Entities lacking banking relationships;
- g. Involvement in commercial negotiations by unauthorized individuals or entities;
- h. Failure to provide criminal records or antimafia certificates when requested;
- i. Failure to provide proof of enrollment in relevant professional registers when required;
- j. Entities subject to an antimafia disqualification or denied registration in public lists managed by institutional authorities.

The discovery of such situations negatively impacts the assessment of professional reliability, unless justified explanations or favorable legal outcomes neutralize the negative judgment. Information regarding criminal risks collected from public institutions or private organizations is shared with company management and operational functions solely for the purposes outlined in this Code.

3. Personnel Selection Criteria and Rules of Conduct

Recruiting at all levels must be transparent and based solely on:

- a. Specific professional qualifications related to the role;
- b. Equal treatment;
- c. Reliability in regard to the risk of criminal influence.

Personnel must be informed and trained on the Antimafia Code and antimafia legislation in general. It is strictly prohibited for staff to disclose any decisions or intentions of AVR Group to third parties unless specifically authorized by a power of attorney or delegation.

4. Supplier and Costumer Selection Criteria

a. SUPPLIER SELECTION

To prevent criminal infiltration, all available information sources must be used, both during initial supplier selection and for ongoing assessments. Selection procedures must follow these criteria:

- a. Transparency;
- b. Equal access opportunities;
- c. Professionalism;
- d. Reliability;
- e. Cost-effectiveness;
- f. Absence of the risk factors mentioned in Article 2;
- g. Indicators that criminal influence is excluded or minimal, such as negative antimafia reports during public tenders, inclusion in Prefecture "white lists," or other certifications issued by oversight authorities.

In high-risk sectors or regions, supplier selection must be based on careful evaluation of all available information, especially points f) and g) above. Decisions must be well justified and documented in an internal archive (including digital), in compliance with data privacy regulations.

b. COSTUMER SELECTION

All accessible information about customers must be collected, not only for standard commercial evaluation but also to verify possible ties to criminal organizations.

Contracts with private customers must be immediately suspended and reported to Management if concrete signs of criminal infiltration emerge—based on risk indicators from Article 2—or if unjustified changes occur, such as:

- a. Sudden or repeated changes in company ownership or management;
- b. Significant changes in the business sector;

c. Abrupt changes in company size, assets, or purchasing volumes.

5. Payments and Other Financial Transaction

All payments or financial transactions must be made through authorized intermediaries to ensure traceability via proper documentation. Credit or debt transfers to third parties are prohibited unless performed by authorized entities.

Cash payments are only allowed for amounts up to €1,000 and may not be split to circumvent this limit.

Payments by bearer checks are not allowed.



6. Security measures, Reporting Obligations, and Forms of Cooperation with Police and Judicial Authorities

All AVR Group workers are strictly prohibited from complying with any extortion requests (e.g., protection money or coercive offers). Any such incidents must be reported immediately to Management, the Supervisory Body, and the police.

In the case of threats or damage to company property, workers are required to inform Management, the Supervisory Body, and the police without delay and to fully cooperate by providing any relevant information or background that may assist investigations.

Any other fact or circumstance indicating a risk of criminal interference must also be promptly reported to the Supervisory Body by anyone who becomes aware of it. The Supervisory Body, acting independently, will promptly inform the relevant authority. Confidentiality and, where possible, anonymity are guaranteed for those who fulfill the obligation to report or file complaints, with full support—including legal assistance—

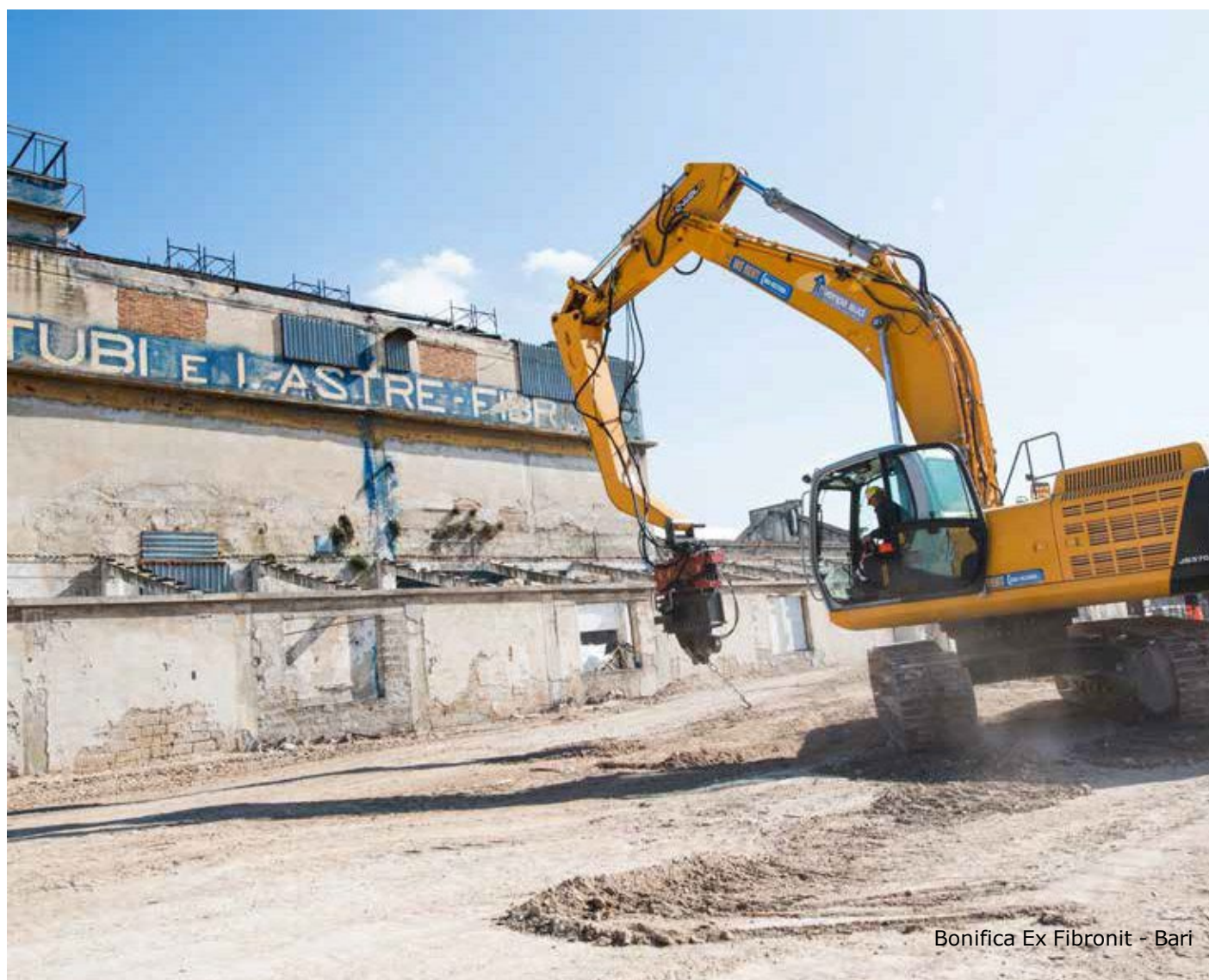
provided by the Management.

The company ensures that no retaliatory actions of any kind are taken against the reporting party and informs the competent authorities to potentially activate appropriate protective measures.

Failure by employees, managers, directors, and shareholders to comply with the obligation to report concrete risks of criminal infiltration constitutes a serious disciplinary offense.

7. Other Stakeholders

As part of establishing a system of local networks, the AVR Group is committed to encouraging participation in memoranda of understanding (or similar agreements) between public bodies, companies, trade associations, and labor unions aimed at preventing criminal infiltration and promoting development and legality within the areas in which it operates.



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