Organisation, Management and Control Model

PIACENZA CALCIO 1919 · UNDER LEGISLATIVE DECREE NO. 231 OF 8 JUNE 2001

English translation of the "Modello organizzativo di gestione e controllo ai sensi del D. Lgs. n. 231/2001" (update of 28 May 2020) for information only. In case of any discrepancy, the Italian original prevails. The company was then named Piacenza Calcio 1919 S.r.l.; it now operates as Piacenza Calcio 1919 SSD a r.l. Annex 1 (the text of the Italian statutory provisions) and Annexes 4 and 5 (2020 Covid-19 procedures, no longer in force) are listed but not translated; see the closing note.

Revision history

- Rev. 00 · First issue · Board resolution of 22/12/2017 · Chairman of the Board: Marco Gatti
- Rev. 01 · Update 1 · Board resolution of 28/05/2020 · Chairman of the Board: Marco Gatti

Contents

- 1. Introduction
- 2. Code of Ethics
- 3. Activities at risk of Offences
- 4. Protocols for making and implementing decisions
- 5. Protocols on financial statements and corporate matters
- 6. Management of financial resources
- 7. Protocols for preventing other Offences and carrying out controls
- 8. Disciplinary system
- 9. Supervisory Body
- 10. Information to the Supervisory Body
- 11. Structure of this Organisation Model

Annexes:

- Annex 1 · Provisions giving rise to the liability of Entities for Offences, and the related provisions of the Criminal Code and other laws
- Annex 2 · Procedure for managing the contracts of registered members
- Annex 3 · Procedure for managing relations with the fans
- Annex 4 · Covid-19 risk management procedure (rev. of 30/04/2020)
- Annex 5 · Covid-19 risk management protocol (rev. of 19/05/2020)

1. Introduction

In 2001 the Italian legal system was profoundly changed (Legislative Decree no. 231 of 8 June 2001, the "Decree") by the introduction of the principle of liability, criminal in substance if not in name, of entities other than natural persons ("Entities"), in fulfilment of the obligations arising from the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, signed in Paris on 17 December 1997. Further offences have since been added to the original ones (generally, the "Offences").

Therefore, if directors, managers, employees or external collaborators of the Company or Entity commit an Offence in the interest or to the advantage of the Company or Entity (and not their own), the liability of the Company or Entity is added to, and does not replace, the personal liability of those who actually committed the Offence.

However, the Company or Entity may be exempt from liability if it is organised so as to ensure control over the regularity and legality of its operations, and is therefore capable of preventing Offences. The Company, which for a long time has given itself rules and principles of conduct designed to ensure compliance with the law and transparency towards all its stakeholders, has reorganised and reformulated those rules and principles, supplementing them where necessary to meet the requirements of the Decree, and has set them out in this model (the "Organisation Model"), which it hereby adopts and will implement.

The Offences are set out in Articles 24, 24-bis, 25, 25-bis, 25-ter, 25-quater, 25-quater.1, 25-quinquies, 25-sexies, 25-septies, 25-octies, 25-nonies, 25-decies, 25-undecies and 25-duodecies of the Decree, as amended, and are reproduced in Annex 1 together with the provisions of the Criminal Code and other criminal provisions to which they refer.

This Organisation Model was prepared after examining the Company's organisation in light of the principles and guidance of the following bodies:

- Confindustria: Guidelines for building organisation, management and control models under Legislative Decree no. 231/2001;
- Italian Football Federation: Internal Organisational Rules of the FIGC (the so-called "NOIF").

This Organisation Model has been updated to implement FIGC Official Communication no. 96/A of 03.10.2019, containing Guidelines for the application of Article 7 of the new Code of Sports Justice. To this end, the procedures "Management of the contracts of registered members (players and staff)" and "Management of relations with the fans" have been formalised and are annexed as an integral part of this Organisation Model.

Also annexed to this Organisation Model are the protocols and procedures currently defined by the Company for managing the risk arising from the Covid-19 pandemic for its administrative structure, in the knowledge that the matter is evolving and will later be updated and supplemented with regard to managing Covid-19 risk in sporting activity once that activity resumes.

2. Code of Ethics

1 Introduction

1.1 Reasons for and purposes of the Code of Ethics

This Code of Ethics sets out the commitments and responsibilities of the Company towards everyone with whom it deals in any capacity.

The Code of Ethics sets out the guiding principles and the fundamental rules of conduct that its Addressees must observe in carrying out their duties and activities.

The Company undertakes to ensure that its external relations are based on strict compliance with the law and with the rules of fairness and transparency, respecting the legitimate interests of everyone with whom it deals in any capacity.

It is therefore necessary to identify and define the values that all Addressees of this Code of Ethics must share, including everyone who, directly or indirectly, permanently or temporarily, enters into relationships with the Company, accepting the resulting responsibilities, roles and models of conduct that must characterise acting in the name of, on behalf of and/or in collaboration with the Company.

In general, any behaviour that breaches the standards of fairness in relations within and/or outside the Company is considered unethical.

Unethical conduct undermines the relationship of trust established with the Company in any capacity.

1.2 Addressees of the Code of Ethics

The Addressees of the Code of Ethics are:

- the Company's officers, namely the members of its statutory bodies;
- the managers and heads of the Company's functional areas and offices, whose specific tasks include making the entity's actions comply with the principles of the Code of Ethics, spreading knowledge of it among employees and collaborators and encouraging its acceptance;
- employees in a subordinate employment relationship with the Company;
- first-team players, coaches and technical staff;
- youth-sector players, coaches and technical staff;
- collaborators working with the Company on a project or coordinated and continuous basis, including consultants and anyone who enters into a relationship with the Company;
- third parties acting in the interest and/or to the advantage of the Company and, more generally, everyone acting in the name of and/or on behalf of the Company in any capacity, without distinction or exception;
- members of the administrative and control bodies, employees, collaborators, occasional workers and providers of services and/or professional services to service companies.

As regards collaborators and third parties who come into contact with the Company, the Company expects the standards of conduct set out in this Code to be shared and scrupulously observed by them, regardless of whether they are strictly subject to its direction and supervision and therefore to derived or indirect liability.

Those required to comply with this Code are therefore referred to collectively as "Addressees". "Addressees for information" are also all those who, in various capacities, have a potential interest in compliance with this Code of Ethics or whom the Company considers should be informed of its contents.

All Addressees are given adequate information on the contents of the Code, so that it can be scrupulously observed for the whole duration of their relationship with the Company.

In particular, the Code of Ethics is brought to the attention of the members of the Company's bodies, its employees and everyone with whom the Company has ongoing relations, whether continuous or not, through appropriate means of communication, and is available to the public on the Company's website.

Compliance with this Code by Addressees also presupposes compliance with all the Company's internal regulations, as approved from time to time by the competent bodies.

2 General ethical principles

Compliance with the laws and regulations in force in all the countries in which it operates is an essential principle for the Company, which prohibits any conduct in breach of them, in particular the unlawful conduct covered by Legislative Decree no. 231 of 8 June 2001 as amended.

The Company also adheres to the principles of fair competition, honesty, integrity, fairness and good faith, respecting the legitimate interests of the Addressees and of the communities in which it operates.

The Company promotes its employees' knowledge of the law and of the conduct it requires and, where there are doubts about how to proceed, informs them appropriately.

Compliance with the Code of Ethics by all Addressees, each within their own responsibilities and functions, helps the Company achieve its objectives and is fundamental to its proper functioning, reliability and reputation.

All Addressees of this Code must know the rules in force, refrain from conduct contrary to them, and turn to a superior or to the Supervisory Body for clarification, reporting any breaches by officers and representatives, employees, collaborators or third parties (including partners and suppliers).

Addressees of the Code must also cooperate with the structures responsible for investigating breaches and must inform counterparties of the existence of the Code.

To ensure compliance with the rules and principles of this Code, a Supervisory Body has been set up, together with a Sanctions System that covers cases of wrongdoing by Addressees and provides for appropriate sanctions.

In every contractual relationship, counterparties must be informed of the ethical principles contained in the Code and must respect them, failing which the consequences set out in the relevant contract will apply.

The Company does not set performance targets that could only be achieved by sacrificing the principles of this Code. Any incentive and bonus schemes must always meet criteria of consistency and fairness.

2.1 Honesty and compliance with rules

Honesty and compliance with internal rules, the Articles of Association and the law are not only fundamental principles for all the Company's activities but an essential element in its management.

In their respective activities, Addressees and everyone acting in the name and on behalf of the Company must comply with the national and EU laws in force and, where applicable, with professional codes of conduct. Employees must also comply with the rules of conduct contained in the collective employment agreements applicable to them.

Conduct contrary to the laws and regulations in force is never tolerated by the Company, even if adopted in its interest. Any breach of those rules will therefore lead to the sanctions provided for by the Sanctions System.

2.2 Professionalism and quality

Addressees carry out their activities with the professionalism required by the nature of their tasks and functions, making every effort to achieve the objectives assigned to them and taking on their responsibilities.

Within their respective competences and functions, Addressees must follow the procedures laid down for those tasks and duties, to the highest standards of professionalism and quality.

2.3 Respect for the person and equal opportunities

In decision-making processes affecting its relations with anyone it deals with in any capacity, the Company does not allow any kind of discrimination based on age, sex, sexual orientation, marital status, health or disability, race, nationality, physical appearance, political opinions and affiliations, or religious beliefs and affiliations.

The Company also ensures respect for the physical, cultural and moral integrity of all the people it deals with, and guarantees safe and healthy working conditions. In particular, it protects and promotes the value of human capital, in order to improve and develop the skills of its employees.

The Company opposes undeclared work and child and juvenile labour, and any other conduct constituting an offence against the individual.

Requests and threats that induce directors, employees and external collaborators to act against the law or against this Code of Ethics are not tolerated.

2.4 Prevention of corruption, gifts and presents

In conducting its activities, the Company prohibits any action towards or by third parties that could undermine their impartiality and independence of judgement. To this end, the Company undertakes to implement the measures necessary to prevent and avoid corruption and other conduct that could give rise to the risk of committing this and the other offences covered by Legislative Decree no. 231/01.

In this regard, the Company prohibits Addressees and their family members from paying or accepting sums of money, gifts, favours or other benefits to or from third parties in order to obtain direct or indirect advantages for them. Addressees may, however, accept or offer gifts of modest value that fall within normal hospitality and courtesy and/or are given on special occasions. Beyond their objective economic value, gifts and benefits are considered of "modest value" if making them public would not reasonably cause embarrassment or difficulty to either the recipient or the giver.

Gifts whose value is not easy to estimate or is not modest (as defined above), or that are of modest value but repeated in the same year, must be reported to the Addressee's manager or body, which will promptly inform the Supervisory Body.

In any case, gifts, payments, expenses, hospitality or other benefits may be given or received if they are acts of business courtesy, do not compromise the integrity and reputation of either party and cannot be interpreted as intended to create an obligation of gratitude or to obtain advantages improperly.

Gifts, economic benefits or other advantages offered or received in any circumstances must in any case be reasonable and in good faith.

No questionable or illegal practice can in any way be justified or tolerated on the grounds that it is "customary" in the sector or in the countries in which the Company operates.

In particular, the Company prohibits:

- offering, promising, giving or paying, or authorising anyone to give or pay, directly or indirectly, an economic advantage or other benefit to a Public Official or a private individual;
- accepting a request or solicitation from, or authorising anyone to accept or solicit, directly or indirectly, an economic advantage or other benefit from a Public Official or a private individual;

where the intention is to:

- induce a Public Official or a private individual to perform improperly any public function or any business-related activity, or reward them for having done so;
- influence an official act (or omission) by a Public Official or any decision in breach of an official duty;

- obtain, secure or retain business or an unfair advantage in connection with business activity;
- in any case, break the applicable laws.

This prohibition is not limited to cash payments and includes, for corrupt purposes:

- gifts, except as specified above;
- expenses for the benefit of third parties, meals and travel;
- contributions in kind, such as sponsorships, except as specified below;
- business activities, jobs or investment opportunities;
- confidential information that could be used to trade in securities and regulated products;
- personal discounts or credits;
- facilitation payments;
- assistance or support to family members;
- other advantages or benefits.

Political contributions may constitute the offence of corruption and therefore carry the risk of resulting liability (if aimed at obtaining a permit or licence, winning a contract and so on).

Because of these risks, any direct or indirect contributions in any form to political parties, movements, committees, political and trade union organisations and their representatives and candidates are permitted only within the limits of the applicable laws and rules. If there is doubt about the nature of a contribution, a specialised external legal adviser may be consulted.

All company contributions must in any case be approved by an appropriate resolution of the Board of Directors, supported where necessary by a legal opinion, and recorded correctly, truthfully and transparently. The related documentation must be archived to ensure traceability.

Charitable contributions, donations and sponsorship activities present a risk with regard to the offence of corruption, and must therefore be approved by an appropriate resolution of the Board of Directors and recorded correctly, truthfully and transparently. The related documentation must be kept in a dedicated archive to ensure traceability.

The Company in any case prohibits all forms of corruption in favour of anyone.

All Addressees of this Code must turn to a superior or to the Supervisory Body for clarification or to report any breaches.

2.5 Conflicts of interest

Addressees of this Code must always act solely in the best interest of the Company, avoiding any possible involvement of personal or family interests that could interfere with the impartiality of their actions and decisions.

The Company undertakes to establish and implement appropriate measures to prevent and avoid conflicts of interest.

The Company avoids in every way situations in which those involved in transactions are, or may be, in a conflict of interest, in particular personal or family interests that could affect their independence of judgement or interfere with their ability to decide impartially what is in the Company's best interest and how best to pursue it in compliance with the rules of the organisation and management model.

2.6 Impartiality

The Company avoids any form of discrimination.

The Company intends to protect the value of equal treatment, refraining from behaviour that favours some persons or categories of persons over others.

The Company also undertakes to act fairly and impartially, behaving in the same way towards everyone it deals with.

2.7 Transparency and accuracy of information

The Company ensures correct, complete, adequate and timely information both internally and externally.

In particular, everyone involved in preparing the data contained in financial statements, reports and all "external" communications is required to act according to the principles of fairness, transparency, cooperation and compliance with the law and the regulations in force, in order to provide a true and fair picture of the Company's economic, asset and financial position.

2.8 Confidentiality · IT and electronic systems

The Company considers the protection of personal data a fundamental right. It therefore ensures the confidentiality and security of the information it holds, guaranteeing compliance with the relevant legislation, including through regular training of its authorised staff, and avoiding unauthorised processing of personal data.

Particular care is taken to protect sensitive data.

Addressees may not use confidential information for purposes unrelated to the activity they are responsible for.

Any information relating to the Company acquired or produced by an Addressee in the course of, or in connection with, their relationship with the Company is confidential and may not be used, disclosed to third parties or circulated without following the specific authorisation procedures the Company has put in place for this purpose.

Confidential information includes all data, knowledge, deeds, documents, reports, notes, studies, drawings, photographs and any other material relating to the organisation and assets, financial transactions, research and development activities, and judicial and administrative proceedings concerning the Company.

Confidential information also means any confidential information about facts or circumstances not in the public domain that are of particular organisational, asset, financial, economic or strategic importance and concern the Company, the companies in which it holds interests, the entities to whose management or control bodies it appoints members, and its partners.

The obligation of confidentiality remains in force after the relationship with the Company ends, in accordance with the legislation in force.

All confidential information must be kept in places inaccessible to unauthorised persons.

It is forbidden to access the information systems used by the Public Administration without authorisation, to alter their operation in any way, or to interfere in any unauthorised way with data, information or programs contained in or relating to an IT or electronic system in order to obtain and/or improperly modify information to the advantage of the Company or third parties, or in any case to obtain an undue advantage for the Company or third parties.

It is also forbidden to:

- gain unauthorised access to an IT or electronic system, or unlawfully hold and distribute access codes to IT or electronic systems;
- distribute equipment, devices or computer programs designed to damage or interrupt an IT or electronic system;
- unlawfully intercept, prevent or interrupt IT or electronic communications, or install equipment for such purposes;
- damage information, data and computer programs in general or those used by the State or another public body or otherwise of public utility, or damage IT or electronic systems;
- process personal data in breach of Legislative Decree no. 196/2003.

2.9 Proper financial flows

Any transaction that could involve even the slightest possibility of the Company being involved in receiving stolen goods, money laundering, self-laundering, use of goods or money of unlawful origin, or tax evasion is strictly prohibited.

Financial flows must be managed in compliance with the rules in force, ensuring complete traceability of the related transactions and keeping adequate documentation, within the limits of the responsibilities assigned to each Addressee.

In particular, all payments and other transfers made by or to the Company must be accurately and fully recorded in the accounting systems and must be made only to the persons and for the activities formalised in contracts and/or approved by the Company.

In carrying out the Company's business, its bodies and employees must not:

- acquire, receive or conceal money or goods deriving from any crime, or in any way be involved in having them acquired, received or concealed;
- replace or transfer money, goods or other benefits deriving from an intentional crime, or carry out transactions that hinder the identification of their criminal origin;
- use money, goods or other benefits deriving from crime in economic or financial activities;
- having committed or helped commit an intentional crime, use, replace or transfer the money, goods or other benefits deriving from that crime in economic, financial, business or speculative activities so as to actually hinder the identification of their criminal origin.

2.10 Guarantee of good governance

The high professionalism, competence and reliability of the Company's employees and collaborators are fundamental to its success and to the effectiveness and efficiency of its internal decision-making.

A management act is correct and transparent when, in addition to complying with all applicable rules, it meets each of the following requirements:

- it is adopted by the competent institutional body, with any necessary approval from a higher body;
- it is based on a rational and impartial analysis of risks and opportunities, solely in the Company's interest;
- it is the result of an adequately traceable process;
- it is properly documented, including in the essential stages of its preparation.

The Company ensures that its administrative and accounting system is adequate, so as to always achieve a correct and reliable representation of management events, in particular through accounting and financial documents, which must accurately and clearly reflect economic transactions and the financial position. In performing their functions and within the limits of their competences, all Addressees are responsible for the accuracy and completeness of the information they provide and the entries they make.

The Company promotes an organisation based on effective controls and cooperation, in order to spread a genuine "culture of control". Without prejudice to the relevant competences and procedures, all Addressees are responsible for implementing and operating internal controls.

In particular:

- no one is given unlimited powers;
- powers and responsibilities are clearly defined, without overlaps between functions, and are known within the organisation;

- the functions and tasks of those involved in the relevant stages of a potentially risky process are kept separate;
- authorisation and signing powers are consistent with the organisational responsibilities assigned;
- spending authorisation thresholds are precisely set and made known;
- the system of responsibilities of top management is clearly defined and delegations are consistent with it;
- powers of attorney granted to act externally are consistent with the system of delegations;
- the system of powers of attorney explicitly excludes "requesting money or other benefits from third parties";
- powers of attorney are made known to external counterparties;
- the power to represent the Company towards all third parties is granted by formal and registered acts.

Every operation, transaction and action must be:

- lawful, consistent, appropriate, authorised and verifiable;
- correctly and adequately recorded, so that the lawfulness, consistency and appropriateness of the decision, authorisation and execution process can be checked; recording may only take place when all the required documents and/or controls are in place;
- supported by documents that allow, at any time, checks on the characteristics and reasons for the operation and identification of who authorised, carried out, recorded and checked it.

Regular checks are carried out on:

- the Company's financial flows;
- documentation and, in particular, supplier invoices, checking that each payment corresponds to a genuine transaction with the Company and is consistent with it;
- external collaborators;
- the genuineness and truthfulness (formal and substantive) of documents submitted to the public administration for any purpose;
- documentation to be submitted for fundable projects;
- employees and external collaborators involved in purchasing goods and services for the Company;
- recruitment and management of staff in the areas identified as at risk of offences under Legislative Decree no. 231/2001.

2.11 Responsibility towards the community

In carrying out its activity, the Company takes on its responsibilities towards the community. It maintains and develops a relationship of trust and continuous dialogue with everyone it deals with in any capacity, seeking where possible to inform and involve them in matters that concern them.

2.12 Transparency and control of management activities

All transactions and operations must be adequately recorded, and it must be possible to verify the decision-making and authorisation processes behind them. Every operation must be supported by adequate documentation, so that checks can be carried out on its characteristics and reasons and the bodies and/or persons who authorised, carried out, recorded and checked it can be identified.

2.13 Protecting the quality and efficiency of the organisation and the Company's reputation and image

The quality and efficiency of the organisation and the Company's reputation and image are an invaluable asset and are largely determined by the conduct of each Addressee.

The conduct of even a single Addressee that does not comply with this Code can therefore in itself cause significant damage to the Company.

Every Addressee must, through their own conduct, help safeguard this asset and, in particular, the Company's reputation and image.

2.14 Respect and integrity

Every Addressee recognises and protects the personal dignity, private life and personal rights of every individual they deal with.

In performing their functions, every Addressee acts transparently and honestly, taking on the responsibilities that come with their role. They are a reliable partner and do not make commitments they cannot keep.

Every Addressee is honest and transparent about the strategies, objectives and operations in which they take part, complies with the laws in force and avoids conflicts of interest.

Every Addressee considers as broadly as possible the ethical implications of their conduct, so as to avoid unintended negative consequences for the Company and all other Addressees.

In particular, every Addressee follows the principles of courtesy and tolerance, respecting cultural differences and human diversity of background and experience.

These principles apply in relations with other Addressees, with third parties and, in general, with everyone the Company deals with in any capacity.

The Company supports and promotes every action aimed at instilling a culture of respect for others, condemning all forms of discrimination based on race, culture, sex or religion. The Company will enforce this position without delay and will take exemplary measures in the event of lapses by any of its registered members or its fans.

3 General criteria of conduct

3.1 General rules

Addressees must adopt and maintain ethical behaviour that complies with the law and is in line with the Company's policies.

In relations with users, fraudulent behaviour, acts of corruption, favouritism and, more generally, any conduct contrary to the rules in force and to this Code are prohibited.

The Code of Ethics must also be respected in relations with the media, public institutions, and political and trade union organisations.

The Company's policy aims to guarantee adequate standards of quality and safety, and every employee and external collaborator therefore undertakes to ensure that this level of service is maintained.

3.2 Internal relations

The Company promotes an institutional practice that combines the principle of separating the functions of direction, administration and control with a commitment by its bodies to mutual and constructive cooperation, in strict compliance with their respective competences and with the decision-making and management protocols set out in the Articles of Association and in any regulations on the functioning of those bodies.

Members of the Company's bodies must declare any interests they hold, on their own behalf or on behalf of third parties, in relation to specific resolutions that their body is about to adopt.

3.3 Relations with staff

The Company undertakes to create a calm working environment in which everyone can work in compliance with the law and with the principles and values of this Code.

The Company also ensures the confidentiality of the information it holds with regard to employees and collaborators.

The Company ensures that its employees and collaborators behave, and are treated, with dignity and respect, within the framework of the laws in force.

The Company does not tolerate any form of isolation, exploitation or harassment, nor does it allow any form of discrimination, for personal or work reasons, by any employee or collaborator against other employees or collaborators.

The Company prohibits any disciplinary sanction against employees and collaborators who have legitimately refused to perform work improperly requested of them by anyone connected with the Company.

The Company complies with employment law, with particular attention to the work of minors and women and to the legal provisions on health and safety at work. The Company complies with its legal obligations regarding trade union rights and rights of association and representation.

The Company's employees must comply with the laws and regulations in force in all the countries in which the Company operates. They must also comply with this Code of Ethics, without prejudice to every other obligation of diligence and loyalty towards the Company and of compliance with its instructions.

Prohibited conduct includes offering to the Company's staff, or receipt by its staff or by anyone acting on its behalf, of an economic advantage or other benefit.

Company staff who breach the Code of Ethics may be subject to disciplinary measures and any other action necessary to protect the Company's interests.

Company staff will not be dismissed, demoted, suspended, threatened, harassed or discriminated against in any way in their employment for refusing to make a prohibited payment.

The Company ensures an adequate programme of continuous training and awareness-raising on matters relating to the Code of Ethics.

Consultants, collaborators, suppliers, customers and anyone dealing with the Company must comply with the laws and regulations in force in all the countries in which it operates, and with the organisational and procedural rules it has adopted, in particular those expressly intended to prevent offences.

No relationship will be started or continued with anyone who does not intend to comply with this principle.

Any appointment to act on behalf of and/or in the interest of the Company towards the Public Administration must be made in writing and include a specific clause binding the appointee to comply with this Code of Ethics. In any case, the fee paid must be strictly proportionate to the service specified in the contract and actually provided to the Company, and payments may not be made to anyone other than the contractual counterparty or in a third country other than that of the parties or of performance of the contract.

3.4 Relations with suppliers

Relations with suppliers are based on the search for a fair competitive advantage, equal opportunities, fairness, impartiality and equity. When selecting a supplier, the criteria are based on assessment of quality levels, technical and professional suitability and respect for the environment, as well as cost-effectiveness. In the selection process, no undue pressure aimed at favouring one supplier over another, such as to undermine the credibility of and trust in the Company's transparency and rigour in applying the law and its internal procedures, is allowed or accepted.

More specifically, fees and/or sums paid to those holding professional appointments must be adequately proportionate to the work performed, also taking market conditions into account. Payments may not be made to anyone other than the contractual counterparty.

In any case, in contracts for works, staffing, procurement or supply of goods or services to the Company, the following rules must be observed in particular:

- personal interests in the performance of one's functions that could give rise to a conflict of interest are reported to the Supervisory Body;
- in competitive tenders, suppliers must not be unfairly favoured or hindered; objective assessment and selection criteria and transparent procedures are adopted for this purpose. Consequently, candidate suppliers who meet the qualification requirements set by the Company from time to time must not be denied the opportunity to win the contract;
- invitations from counterparties may be accepted only if their reason and scope are reasonably suitable and appropriate and refusing them would breach the duty of courtesy;
- it is not permitted to place personal orders with persons with whom one has professional relations, from which undue advantages could be obtained and/or through which the award of an appointment by the Company to a supplier could be directly or indirectly influenced.

The Company requires its suppliers to comply with:

- employment law, with particular attention to the work of minors and women and to the legal provisions on health and safety at work;
- legal obligations regarding trade union rights and rights of association and representation.

3.5 Relations with financial intermediaries

To achieve its asset management objectives, the Company may use the professional services of authorised intermediaries, chosen through transparent and impartial procedures and according to criteria that serve solely the Company's interest.

The choice and management of the relationship are governed by specific internal provisions.

3.6 Relations with the media and use of social networks

In line with the principles of transparency and completeness of information, the Company's external communication respects the right to information.

Relations between the Company and the media are the responsibility of the specifically designated company functions and must be conducted in line with the communication policy defined in the Code of Ethics. Addressees may therefore not provide information to media representatives without the authorisation of the competent functions.

Every registered member or employee of the Company must use their personal communication on social networks or any other means of communication properly. In particular, it is forbidden to express judgements that damage the honour and image of the Company or of other registered members and/or employees.

3.7 Relations with Public Institutions and Supervisory Authorities

Those responsible for relations with Public Institutions and Supervisory Authorities must maintain the utmost transparency, clarity and fairness.

These relations must not lead Public Institutions and Supervisory Authorities to partial, distorted, ambiguous or misleading interpretations.

It is not permitted to offer money or gifts to managers, officials or employees of Public Institutions and Supervisory Authorities, or to their relatives, whether Italian or from other countries, except for "protocol gifts" on official occasions, under specific resolutions of the Board of Directors adopted for that purpose.

It is forbidden to offer or accept any object, service, performance or favour of value in order to obtain preferential treatment in any relationship with the Public Administration.

When any negotiation, request or relationship with the Public Administration is under way, the staff responsible must not try to improperly influence the decisions of the counterparty, including those of officials who negotiate or take decisions on behalf of the Public Administration. In any case, the staff responsible must require representatives, employees and officials of the Public Administration to comply with the "Code of Conduct for Public Administration Employees", currently Presidential Decree no. 62 of 16 April 2013.

In the specific case of carrying out a procedure with the Public Administration, staff must act in compliance with the laws in force and the standards of fairness.

If the Company uses a consultant or a third party to represent it in relations with the Public Administration, the same instructions that apply to the Company's employees must be applied to the consultant and their staff or to that third party.

The Company must also not be represented in relations with the Public Administration by a consultant or third party where situations of conflict of interest may be identified and/or arise.

During any negotiation, request or relationship with the Public Administration, the following actions must not be taken, directly or indirectly:

- examining or proposing employment or other opportunities that could benefit employees of the Public Administration personally;
- offering or in any way providing gifts;
- soliciting or obtaining confidential information that could compromise the integrity or reputation of either or both parties;
- employing former employees of the Public Administration, or their relatives and/or in-laws up to the third degree, who have personally and actively taken part in the negotiation or helped approve the Company's requests to the Public Administration.

Any actual or potential breach must be reported promptly to the head of the relevant body and to the Supervisory Body.

3.8 Relations with control bodies

Communications, reports and responses to requests sent to control bodies must be prepared according to the principles of completeness, integrity, objectivity, transparency and timeliness.

It is forbidden to state untrue facts or to conceal by fraudulent means, in whole or in part, circumstances that must be communicated to the Authorities.

It is strictly forbidden to knowingly obstruct, in any form, the functions of the control bodies in carrying out their institutional checks.

3.9 Relations with the environment and with the fans

The Company carries out its activities in full compliance with the legislation in force, with the objective of continuously improving its environmental performance.

To this end, the Company manages its activities so as to minimise environmental impacts and optimise the use of natural resources.

Everyone, at both senior and operational levels, must adhere to the principles laid down by the Criminal Code and Legislative Decree no. 152/2006 on environmental offences and environmental protection, in particular when decisions must be taken or choices made and, later, when these must be implemented.

The Company promotes its employees' knowledge of the law and of the conduct it requires, including in the specific area of environmental protection, and, where there are doubts about how to proceed, informs them appropriately.

The Company promotes and supports a relationship with its fans based on the principles of loyalty, fairness and respect, starting and defending actions and projects to build a constructive relationship with its supporters through every initiative, including those suggested by the fans themselves.

Registered members of the Company are prohibited from having relations of any kind with fans, whether individually or in organised groups.

In compliance with federal provisions, the Company has established within its organisation chart the role of "SLO" (Supporter Liaison Officer), also known as the Club's Delegate for relations with the fans. The SLO is a professional role introduced in the UEFA Club Licensing and Financial Fair Play Regulations in 2010 and adopted by the Italian Football Federation in its organisational criteria for national licences, as a requirement for clubs taking part in professional championships from the 2012-2013 season.

The SLO is the person responsible for relations with the fans and performs the following functions:

- acting as the key point of contact between the club and the fans, making sure that every supporter has the opportunity to contact an authorised club representative on matters concerning supporters;
- informing the club's management about supporters' issues, acting as an expert adviser on the subject;
- ensuring a link and a channel of continuous communication between the club and the fans and promoting the improvement of this relationship;
- working closely with the club's security officer;
- acting as a mediator in discussions between the club and supporters' groups and between fans and the police.

4 Criteria of conduct at work

The Company's own people are its main resource.

They need to develop culturally, professionally and operationally. The values of this Code and their dissemination underpin every development of the Company.

Every function and level is asked to make its own creative contribution to developing an environment in which people can be passionate about what they do, are oriented towards the future, can contribute innovative thinking, and can have open, cooperative and loyal attitudes. Everyone, in their own area and role, must work with the daily and main objective of raising the quality of the service offered and of their own activities and functions, with regard to both external counterparties and internal offices.

It is essential that staff pay attention to external needs and to everyone who, in various capacities, deals with the Company. Staff must also be able to talk and cooperate with them, understand changing needs and find effective solutions. It is also essential that staff have entrepreneurial and management skills, supported by a sound methodological basis and full knowledge of the areas to which they are assigned.

The Company recognises the important role of its operational structure in carrying out its institutional function in terms of impartiality, adequacy and operational continuity, and promotes the training and growth of the professional skills required for its size and operations.

The Company recognises excellence as the result of the work of individuals with tenacity and high intellectual abilities. This must not lead to working styles focused on individual stardom: only teamwork can build a solid

foundation so that the most innovative ideas can become a lasting part of the organisation. Individual knowledge must become knowledge shared through discussion; from implicit it must become explicit, so that it can turn into excellent and widespread practice.

Full compliance with the law is a fundamental rule for the Company. In their functions, employees must comply with the rules of the legal system in which they operate and must in any case refrain from breaking the law, especially, but not only, where such breaches are punishable by imprisonment, fines or administrative sanctions.

Employees must also observe the general principles of diligence and loyalty and the rules of conduct contained in the collective agreements and regulations applicable to them.

4.1 Respect

Each employee works with women and men of different backgrounds, cultures, religions, orientations and personal choices. They do not commit acts of discrimination, harassment or offence (sexual, personal or otherwise) of any kind, and base all their conduct on the values laid down in the Italian Constitution.

4.2 Fairness, cooperation and effectiveness

Each employee is reasonable in the requests made to beneficiary entities and partners, making sure they are proportionate to the scope and nature of the support concerned.

All employees avoid behaviour that is not transparent, both with external entities and within the organisation.

Each employee determines the effectiveness of their philanthropic and/or management action through a process of comparison and mutual learning with the best operators, and by objectively measuring the effectiveness and efficiency of their work.

Each employee determines and shows how their philanthropic and management activity contributes to achieving the Company's mission and advancing the social good. They consider their activities strategically and assess their sustainability over time, their focus and their duration, in order to ensure maximum effectiveness.

4.3 Responsibility, control and professional growth

Each supervisor (also "Manager") is responsible for the employees under their direction, coordination or control.

All supervisors behave in an exemplary way, showing dedication to work, loyalty and competence. They set clear and realistic objectives, carry out their role by showing trust, and give employees as much responsibility and freedom of action as possible, taking into account their personal and professional aptitudes and experience. Supervisors are available to employees to discuss professional and personal problems.

Each Manager must fulfil their organisational and control obligations. In particular, they diligently supervise to prevent breaches of the law or of this Code.

The supervisor is responsible for the proper performance by employees and/or collaborators of the functions delegated to them.

In particular, each Manager has the following obligations towards employees and/or collaborators:

- to select them carefully on the basis of their personal and professional aptitudes, including with a view to compliance with this Code, bearing in mind that the importance of selection increases with the importance of the duties the employee or collaborator is to perform (obligation of selection);
- to communicate to them precisely, completely and bindingly the obligations they must fulfil, and specifically the obligation to comply with the law and with this Code (obligation of instruction);

- to make clear to them, unequivocally, that any breach of the law or of this Code, besides being disapproved of, may constitute a breach of contract and/or a disciplinary offence under the legislation in force (obligation of disciplinary information);
- to explain the tasks assigned and the strategies behind them and to provide all appropriate training, so that everyone performs their functions with the necessary skills and tools (obligation of training);
- to give them regular feedback on the progress and quality of their work and on changes in strategic plans (obligation of assessment);
- to monitor continuously their compliance with the law and with this Code (obligation of control);
- to report promptly to their superior or to the competent body any findings and information learned about potential or actual breaches of the law or of this Code by anyone (obligation of vigilance);
- to implement or promote, within their functions, the adoption of measures to prevent breaches from continuing and to prevent retaliation against their collaborators or any employee (obligation of prevention).

4.4 Training

The Company believes that the complexity of the issues it faces and of the organisation of projects and decision-making processes requires continuous support and investment.

For this reason, training is considered not an occasional but a structural activity, an integral part of the employee's work, aimed at increasing and protecting the value of people's knowledge and professional quality. This value is a genuine organisational asset of the Company.

4.5 Harassment in the workplace

The Company requires that constitutional values are respected in internal and external working relations and that there is no harassment of any kind, such as creating a hostile working environment for individual workers or groups of workers, unjustified interference with the work of others, or creating obstacles to the professional prospects of others.

The Company does not allow sexual harassment of any kind, in particular making professional growth or any other advantage conditional on sexual favours, or making proposals of private personal relationships that are unwelcome to the person concerned.

4.6 Smoking

Smoking is prohibited in places where it could endanger people's safety and health. Smoking is also prohibited in all situations where work premises are constantly shared by several people.

4.7 Protection of company assets and workplaces

Each Addressee is directly and personally responsible for protecting and preserving the tangible and intangible assets and resources entrusted to them to carry out their tasks, and for using them in the Company's interest.

Each employee must pay the utmost attention in carrying out their work, strictly observing all the safety and prevention measures established or suggested by the specific nature of the work, experience and technical knowledge, under Article 2087 of the Civil Code, in order to avoid any possible risk to themselves and to their collaborators and colleagues.

The technical planning of workplaces, equipment and processes must comply to the highest level with the legislation in force on health and safety at work and on the prevention of the related risks.

The Company's assets, in particular the facilities and equipment in the workplace (e.g. telephones, photocopiers, PCs including software and internet/intranet, machines, tools, etc.), are used for work purposes in accordance with the legislation in force. Consequently, with specific reference to email systems and access to internet/intranet networks, messages received and sent from mailboxes with the Company's domain, even if personal and password-

protected, are presumed not to be personal but addressed to or from the Company, and are therefore always accessible to it.

In no case may company assets, and in particular the Company's IT and network resources, be used for purposes contrary to mandatory legal rules, public order or morality, or to commit or induce the commission of offences, or to incite racial hatred, glorify violence or violate human rights and, in general, the values laid down in the Italian Constitution. With regard to electronic systems in particular, the following are not permitted, by way of example:

- sending and/or spreading messages with insulting, defamatory, threatening, discriminatory or otherwise offensive or vulgar content;
- accessing pornographic websites, recording and/or transmitting pornographic material;
- communicating or spreading confidential company information without proper authorisation;
- gaining unauthorised access to IT systems protected by security measures, or unlawfully obtaining or spreading access codes to such systems;
- damaging information, data and computer programs.

It is not permitted to make audio-visual, electronic, paper, photographic or any other recordings or copies of company documents, except where this falls within the normal performance of the functions assigned.

All Addressees must scrupulously observe the provisions of this Code designed to guarantee and protect the Company's information assets and to meet specific legal obligations. The Company reserves the right to sanction any established breach of these rules.

4.8 Protection of health and safety

The Company undertakes to promote and spread a culture of safety, developing awareness of risk management, promoting responsible behaviour and protecting, above all through preventive action, the health and safety of all employees and collaborators.

Every employee and collaborator must scrupulously comply with the rules and obligations in force on health and safety in the workplace and must not expose other Addressees to risks and dangers that could harm their health and physical safety.

The fundamental principles and criteria on the basis of which the Company's bodies and employees take:

- every decision on health and safety at work;
- the measures necessary to protect workers' safety and health, including the prevention of occupational risks, information and training, and the provision of the necessary organisation and resources;

are:

- avoiding risks;
- assessing risks that cannot be avoided;
- combating risks at source;
- adapting work to the individual, especially as regards the design of workplaces and the choice of work equipment and working and production methods, in order to alleviate monotonous and repetitive work and reduce its effects on health;
- taking account of technical progress;
- replacing what is dangerous with what is not dangerous or less dangerous;
- planning prevention as a coherent whole that integrates technology, work organisation, working conditions, social relations and the influence of factors related to the working environment;
- giving priority to collective protective measures over individual ones;

- giving appropriate instructions to workers.

Everyone, at both senior and operational levels, must adhere to these principles, in particular when decisions must be taken or choices made and, later, when these must be implemented.

4.9 Handling of information

The Company undertakes to manage the flow of information to stakeholders so that it is truthful, complete and accurate, including with regard to financial, accounting and management data.

Everyone who, in the course of their work, has access to confidential information and data must use it only for purposes permitted by law.

Inside information concerning the Company may be communicated within the Company only to an Addressee authorised to receive it and only to the extent necessary for them to perform their functions.

Addressees comply with the legislation in force on so-called "insider trading". In particular, it is forbidden to use or disclose to others, without justified reason, confidential and/or so-called "price-sensitive" information they hold about financial instruments listed in Italy or abroad.

Addressees are expressly forbidden to buy, sell or carry out other transactions, directly or indirectly, on their own account or on behalf of third parties, in financial instruments using inside information learned through their position. Using such information, it is also forbidden to recommend or induce others to carry out any of the above transactions, to disclose the information to others outside the normal performance of their duties, or to spread false news or carry out simulated transactions or other devices actually capable of altering the price of financial instruments.

With regard to companies in which the Company holds interests or to any partners, inside information includes, by way of example and not limited to:

- unpublished financial information, including quarterly or annual financial results not yet made public;
- major acquisitions, disposals or corporate joint ventures;
- significant changes in management or in their Boards of Directors.

4.10 Protection of privacy

All employees and collaborators of the Company are persons authorised to process personal data and may process only the data necessary to perform the duties assigned to them.

All data processing must be carried out fairly and in a lawful manner that guarantees security and confidentiality, with particular regard to the use of electronic tools.

As persons authorised to process personal data, employees inform the data subject of the purposes and methods of processing, whether providing the data is mandatory, the persons to whom the data may be disclosed, the scope of disclosure, their rights, and the identity of the data controller and of the data processor, if appointed, providing a suitable privacy notice and, where sensitive data are processed, requesting the data subject's consent.

As persons authorised to process personal data, all employees must in particular:

- give the data subject an adequate privacy notice and obtain their consent;
- collect and record data for specified, explicit and legitimate purposes and use them in other processing operations only in ways compatible with those purposes;
- process accurate data and keep them up to date;
- acquire and process only data strictly necessary to carry out the activities assigned;
- process data that are relevant, complete and not excessive in relation to the purposes for which they are collected or subsequently processed;

- keep data in a form that allows identification of the data subject for no longer than necessary for the purposes of processing.

Sensitive data, as defined by the legislation in force, may not be processed with electronic or otherwise automated tools. Such data will be processed in accordance with the authorisations issued from time to time by the Data Protection Authority.

Data being processed must be stored and controlled so as to minimise the risks of their destruction or loss, even accidental, unauthorised access, or processing that is not permitted or not in line with the purposes of collection.

Communication and disclosure of data to third parties without authorisation are prohibited.

If processing of the data or the authorisation to process them ends for any reason, the data must be destroyed.

The Company does not carry out any profiling or promotional use of the data it records and processes.

4.11 Protection of copyright

Activities are managed in compliance with the legislation in force on the protection of copyright in creative works.

Members of the Company's bodies, managers, heads of function and employees must behave responsibly and respectfully to protect such works, avoiding improper attitudes or uses that could damage them.

5 Relations with the Public Administration

When taking part in tenders called by the Public Administration and in every negotiation or relationship with it, the Company's bodies and employees must act in compliance with the law, regulations and proper business practice.

In particular, towards public employees or officials acting on behalf of the Public Administration, or private business counterparties when they hold public service concessions, any behaviour that, although part of normal business practice, breaks the law and/or regulations or could in any case be perceived as seeking favours is prohibited.

During any negotiation, request or relationship with the Public Administration, in Italy or abroad, the following behaviour and actions are prohibited, by way of example only, whether carried out directly by the Company's bodies or employees or through persons acting on its behalf:

- promising, offering or in any way providing money, gifts or presents to managers, officials or employees of the Public Administration or to their spouses, relatives or in-laws, whether Italian or from other countries, except for gifts or items of modest value;
- in countries where it is customary to offer gifts to clients or others, this may be done when the gifts are appropriate in nature and of modest value, but always in compliance with local laws;
- offering or accepting any object, service, performance or favour of value in order to obtain more favourable treatment in any relationship with the Public Administration, and in general promising or providing, including through third-party companies, work or services for personal benefit;
- behaving in any way intended to improperly influence the decisions of public employees and officials who negotiate or take decisions on behalf of the Public Administration;
- providing or promising to provide, soliciting or obtaining confidential information and/or documents, or any that could compromise the integrity or reputation of either or both parties, in breach of the principles of transparency and professional fairness between the parties;
- having the Company represented by a consultant or "third party" where conflicts of interest may arise. In any case, consultants or "third parties", and their staff, used by the Company to represent it in relations with the Public Administration are subject to the same instructions that bind the Company's employees;
- examining or proposing employment and/or business or other opportunities that could benefit employees of the Public Administration (or their spouses, relatives or in-laws) personally;

- promising or offering consultancy services.

The behaviour described is also prohibited after the negotiation, request or relationship with the Public Administration has ended, if directed at the public employees and officials who negotiated or took decisions on behalf of the Public Administration.

Also by way of example only, it is forbidden to employ at the Company former employees of the Public Administration (or their spouses, relatives or in-laws) who have personally and actively taken part in the negotiation or in approving the Company's requests to the Public Administration.

6 Legal proceedings

In civil, criminal or administrative proceedings, the Company's bodies and employees must not take (directly or indirectly) any action that could unduly favour or harm any of the parties. In particular, the behaviour and actions listed in the previous article are prohibited, among others. With particular regard to criminal proceedings, it is also forbidden to induce, by violence or threats or by offering or promising money or other benefits, a person called to make statements before the judicial authorities that can be used in criminal proceedings, and who has the right not to answer, to make no statement or a false statement.

7 Funding and other benefits

When applying to the State, other public bodies, the European Communities or bodies of foreign States for contributions, grants or funding, the Company's bodies and employees involved in such procedures must:

- act fairly and truthfully, using and submitting complete statements and documents relevant to the activities for which the benefits can be lawfully obtained;
- once the funds requested have been obtained, use them for the purposes for which they were requested and granted.

8 Currency, public credit cards and revenue stamps, transport tickets, instruments or marks of identification

In carrying out the Company's business, its bodies and employees must not:

- counterfeit or alter in any way national or foreign currency, watermarks, revenue stamps or public credit cards;
- buy or otherwise receive, hold, spend or put into circulation counterfeit or altered currency, watermarks or revenue stamps, or computer programs or instruments intended exclusively for counterfeiting or altering such items;
- counterfeit or alter railway tickets or tickets of other public transport companies, or buy or put into circulation such counterfeit or altered tickets;
- counterfeit or alter national or foreign trademarks or distinctive signs of creative works or industrial products, or national or foreign patents, industrial designs or models;
- use counterfeit or altered national or foreign trademarks or distinctive signs, patents, designs or models;
- bring into the territory of the State, or trade in, products bearing false marks.

9 Conduct of the Company's business

In conducting the Company's business, directors must inform the other directors and the Board of Statutory Auditors of any interest they have, on their own behalf or on behalf of third parties, in a specific transaction of the Company.

10 Results of the Company's business

In preparing the financial statements, preparatory documents or other similar documents, the bodies and all employees involved in this activity must behave correctly, cooperate fully, ensure that the information provided is complete and clear and that data and calculations are accurate, report conflicts of interest, and so on.

Directors, general managers, managers responsible for preparing the company's accounting documents and their collaborators must:

- represent the economic, asset or financial position truthfully, clearly and completely;
- respond promptly to requests for information from the Board of Statutory Auditors and facilitate in every way the control or audit activities legally assigned to shareholders, other corporate bodies or audit firms;
- submit to the Board of Directors complete deeds and documents that match the accounting records, and refrain from simulated or fraudulent acts aimed at unlawfully determining a majority;
- provide supervisory bodies with correct and complete information on the economic, asset or financial position.

11 Market manipulation and insider dealing

In carrying out the Company's business, its bodies and employees must not:

- spread false news or carry out simulated transactions or other devices actually capable of significantly altering the price of financial instruments, whether listed or not;
- buy, sell or carry out other transactions, directly or indirectly, on their own account or on behalf of third parties, or recommend or induce others to carry out any such transaction, in financial instruments using non-public information that could significantly affect their price, or disclose such information to others outside the normal course of work.

In any case, the use of inside information and its unauthorised disclosure are prohibited.

12 Crimes against industry and trade (disruption of industry and trade, unfair competition, fraud, counterfeiting, false marks)

In carrying out the Company's business, its bodies and employees must not:

- prevent or disrupt the operation of an industry or trade;
- commit acts of competition with violence or threats, or commit fraud in trade (delivering one thing for another or something different from what was declared or agreed) or against national industries;
- sell industrial products with false marks, or by usurping or infringing industrial property rights.

13 Crimes against the individual

In carrying out the Company's business, its bodies and employees must not commit, or allow or facilitate the commission of, the following offences:

- reducing or keeping a person in slavery or servitude, trafficking, buying or selling them;
- inducing, aiding or exploiting child prostitution; exploiting child pornography, organising pornographic performances and inducing minors to take part in them, producing, trading, holding or distributing, including online, pornographic material, including through virtual images using images of minors; organising or advertising tourism initiatives for the exploitation of child prostitution;
- female genital mutilation.

14 Terrorism and subversion of the democratic order

In carrying out the Company's business, its bodies and employees must not:

- promote, set up, organise, direct, finance or take part in associations intended to violently subvert the economic or social order of the State or to violently overthrow its political and legal order;
- commit, or allow or facilitate the commission of, crimes for the purposes of terrorism or subversion of the democratic order; promote, set up, organise, direct, finance or take part in associations with such purposes; or provide or collect funds that could be used for acts of terrorism.

15 Criminal association, including mafia-type association

In carrying out the Company's business, its bodies and employees must not:

- join, promote, set up, organise or take part in associations of three or more persons for the purpose of committing several crimes, belong to mafia-type associations, or promote or engage in political-mafia electoral exchanges;
- give refuge or provide food, accommodation, means of transport or communication tools to any person taking part in such associations;
- associate for the purpose of reducing or keeping a person in slavery or servitude, trafficking in persons in slavery or servitude, or buying, selling or transferring a person in slavery or servitude;
- associate for the purpose of kidnapping persons for extortion;
- associate for the purpose of illegal trafficking in narcotic or psychotropic substances.

16 Association for smuggling foreign manufactured tobacco or for the illegal production, trafficking and possession of narcotic or psychotropic substances

In carrying out the Company's business, its bodies and employees must not associate in groups of three or more for the purpose of:

- bringing into, selling, transporting, buying or holding in the territory of the State smuggled foreign manufactured tobacco; or
- carrying out any activity or operation involving narcotic or psychotropic substances without the authorisation required by law;

nor promote, set up, direct, organise, finance or take part in associations with such purposes.

17 Illegal immigration

In carrying out the Company's business, its bodies and employees must not do anything aimed at procuring anyone's entry into, or facilitating their stay in, the territory of the State in breach of immigration law.

18 Obstruction of justice

In carrying out the Company's business, its bodies and employees must not:

- induce persons called to make statements before the judicial authorities that can be used in criminal proceedings to make no statement or a false statement;
- help anyone, where a crime punishable by life imprisonment or imprisonment has been committed, to evade investigations by the Authorities or escape their searches;
- induce, by violence or threats or by offering or promising money or other benefits, a person called to make statements before the judicial authorities that can be used in criminal proceedings, and who has the right not to answer, to make no statement or a false statement.

19 Employment of third-country nationals staying illegally

In carrying out the Company's business, its bodies must not employ foreign workers without the residence permit required by the legislation in force, or whose permit has expired and has not been renewed within the legal deadlines, or has been revoked or cancelled, with particular attention to cases where more than three such workers are employed, where they are minors below working age, or where they are subject to other particularly exploitative working conditions.

20 Private-to-private corruption

In carrying out the Company's business, its bodies and employees must not give or promise money or other benefits to directors, general managers, managers responsible for preparing company accounting documents, statutory auditors and liquidators, or persons under their direction or supervision.

21 Implementation of the Code of Ethics

Addressees, and in any case everyone who carries out activities on behalf of the Company, must know all the provisions of this Code and the laws and internal regulations of the Company that govern the activity carried out within their function.

In addition, every Addressee must read and expressly accept the contents of this Code of Ethics when the relationship begins, when the Code is first distributed, or when any significant amendments or additions are made to it.

The Company ensures:

- the widest possible distribution and knowledge of this Code among members of its bodies, its employees and collaborators, beneficiary entities and its suppliers;
- the uniform interpretation and implementation of this Code;
- checks following reported breaches of this Code and the application of sanctions where breaches are established;
- the prevention and suppression of any form of retaliation against those who contribute to implementing this Code;
- the periodic updating of this Code, on the basis of needs that arise from time to time, including in light of the activities above.

22 Right to request clarification, complain or report

Without prejudice to any protection provided by law or by collective employment agreements, every employee or collaborator of the Company may request clarification, make complaints or report potential breaches of this Code to their Manager and to the Supervisory Body. Any request for clarification, complaint or report of a breach will be kept strictly confidential, and the person making it may not be sanctioned or suffer any detriment.

An employee or collaborator who has questions, has reason to believe that any provision of this Code may have been breached, or has personally breached it, must promptly discuss it with their Manager or a higher level of management, or with the Supervisory Body.

Employees, collaborators, beneficiary entities, suppliers, partners and, more generally, third parties may contact the Supervisory Body:

- by post: Dott.ssa Claudia Ardesi, c/o Studio Montanari e Associati, Piazza Cavalli 68, 29100 Piacenza (Supervisory Body);
- by telephone: 0523 338660;
- by email: Claudia.Ardesi@studiomf.com.

Translator's note: these are the contact details of the Supervisory Body in office in 2020. The Club's current Supervisory Body is Avv. Roberto Rovero, odv@piacenzacalcio.it.

23 Human Resources function

The Company's Human Resources function:

- takes appropriate measures to distribute this Code as widely as possible and adopts staff training programmes to improve knowledge of it;
- in compliance with the law and the applicable employment contracts, takes the disciplinary measures against staff that prove necessary as a result of breaches of this Code.

24 Supervisory Body

The Supervisory Body is appointed by the Board of Directors and consists of Dott.ssa Claudia Ardesi.

The functions of the Supervisory Body are:

- to monitor and support the application of the Code;
- to check periodically the application of and compliance with the Code of Ethics through "ethical auditing", which consists of ascertaining and promoting the improvement of ethics in the workplace by analysing and assessing the processes for controlling ethical risks;
- to take initiatives to spread the Code of Ethics;
- to receive reports of breaches of the Code of Ethics and investigate them;
- to propose, where necessary, a periodic review of the Code of Ethics;
- to protect and assist employees who report conduct that does not comply with the Code;
- to report any irregularities in compliance with the Code to the competent functions so that effective corrective action can be taken;
- to act in an advisory capacity on the adoption of disciplinary measures;
- to report periodically to the Board of Directors, including through an annual report, indicating any breaches of the Code;
- to promote and prepare communication and training programmes for employees.

All employees and collaborators of the Company must cooperate with the Supervisory Body, providing where necessary the company documentation it needs to carry out its activities. If in doubt about the lawfulness of a particular behaviour, its ethical value or whether it is contrary to the Code of Ethics, an Addressee may contact the Supervisory Body.

Reports of any wrongdoing by employees must be made in writing and may be sent, in addition to through the line of management, to the Supervisory Body by post to the Company's administrative office.

The Supervisory Body also monitors the functioning of and compliance with the Code of Ethics and the Organisation Model. To carry out its tasks properly, the Supervisory Body meets the following requirements and operates with the following characteristics:

- professionalism, in terms of qualifications and professional experience;
- capacity to hold the office, meaning not being legally incapacitated, bankrupt or convicted with a penalty involving disqualification, even temporary, from public office or incapacity to hold management positions;
- good repute;
- independence from the management of the Company;
- autonomy;
- free use of financial resources;
- all the powers necessary to perform its functions, including in particular free access to all the Company's records and documents and the power to obtain from any employee the information and documents requested, provided they are strictly related to the proper performance of the Supervisory Body's mandate and specifically to the functioning, observance and updating of the Organisation Model;

- adequate resources;
- continuity of action.

The Supervisory Body carries out the following activities:

- it monitors the efficiency and effectiveness of the Organisation Model, that is, it checks that actual behaviour is consistent with the model established. To this end it:
  - carries out inspections in ways predetermined and approved by the governing body;
  - has access to all documents prepared for the purposes of the Company's Organisation Model;
  - may request information from directors and any other senior person;
  - may request information from all employees and managers working in the risk areas, even without prior authorisation from the governing body;
  - may request information from the head of management control and internal control;
  - may request information from external collaborators, consultants, agents and representatives outside the Company;
  - may examine the documentation relating to the Company's activities in the risk Areas;
  - periodically receives information from the specifically identified heads of the Areas;
  - proposes the start of disciplinary procedures;
  - reports to the governing body, for appropriate action, established breaches of the Organisation Model that could give rise to liability for the Company;
  - draws up detailed minutes at the end of every inspection, information or proposal activity;
  - regularly prepares a written report on the activities carried out;
- it examines the adequacy of the Organisation Model, that is, its real (and not merely formal) ability to prevent, in principle, unwanted behaviour;
- it analyses whether the Organisation Model remains sound and functional over time;
- it ensures the necessary dynamic updating of the Organisation Model where its analyses show that corrections and adjustments are required as a result of:
  - significant breaches of the provisions of the Code of Ethics and the Organisation Model; or
  - significant changes in the Company's internal structure and/or in the way it conducts its business; or
  - changes in the law;
- it reports breaches of the Code of Ethics and the Procedures by directors.

25 Communication and training on the Code of Ethics

The Company, including through the Supervisory Body:

- promotes application of the Code by Addressees by including in their contracts specific clauses worded as follows: "Code of Ethics: in conducting its business and managing its relationships, the Company follows the principles contained in its Code of Ethics. Breach of the provisions of the Code of Ethics by the contractual counterparty may, depending on the seriousness of the breach, lead to termination of this contract for breach";
- sends the Code to Addressees, who sign it for acknowledgement on receipt;
- distributes the Code;
- provides training sessions, which may differ according to the role and responsibilities of the Addressees, dedicated to raising awareness of the contents of the Code of Ethics and explaining ethical conduct.

The Code is brought to the attention of all possible interested parties, internal and external, through specific communication activities:

- publication on the official website;
- sending by post, fax, email or hand delivery;
- posting a copy of the Code at the Company's premises in a place accessible to all employees and collaborators, under Article 7(1) of Law no. 300 of 20 May 1970.

26 Breach of the Code

Given the importance of compliance with the rules of conduct in this Code, breaches of its provisions will be subject to disciplinary sanctions.

Any behaviour contrary to the provisions of the Code will be pursued and sanctioned as contrary to the principles that inspire the Company.

Breaches of the provisions of the Code damage the relationship of trust with the Company and constitute a disciplinary offence. Disciplinary sanctions are applied regardless of whether any criminal proceedings are started.

For employees, any disciplinary measures for breach of the Code will be proportionate to the type of breach and its consequences for the Company and will be adopted in compliance with the applicable legislation and the collective employment agreements applied by the Company. Breaches of this Code will in any case be taken into account for career progression, promotions and the assignment of responsibilities.

For collaborators, self-employed workers and third parties, breach of the provisions of this Code may lead to termination of the relevant contract under Article 1453 of the Civil Code. Imposing on such persons, even where expressly provided, any of the duties set out in this Code is always subject to the nature of the relationship with them and applies only insofar as compatible with it and, in particular, with the autonomy to which they are entitled, which is preserved and in no way compromised.

Where breaches of the Code of Ethics are committed by members of the Company's bodies, the Board of Directors, on a proposal from the Supervisory Body, will take the measures it considers most appropriate. These may consist of closing the proceedings, if no breach has been established, or otherwise a verbal reprimand, a written censure and, in the most serious cases, suspension or removal from office.

Where the breach has been committed by one or more members of the Board of Directors, at the meeting where the breach is discussed those members must abstain from the related resolutions.

In every case of breach of this Code, the offender and anyone responsible for it, even through mere negligence, will be held liable for damage of any kind caused to the Company.

27 Entry into force and updating

This Code of Ethics, approved by the Board of Directors, entered into force on 22 December 2017.

The Code will be updated and, where necessary, amended to reflect changes in the law and operating experience, and as a result of any changes in the organisation and/or activities of the Company, including on a proposal from the Supervisory Body and/or any interested party, who may submit their observations to the Board of Directors.

Origins and traditions

Over the last century and this one, even in a small city like ours, sport has given Piacenza's fans a great deal of satisfaction. Cycling, rugby, volleyball, athletics, tennis and football are the sports in which Piacenza teams and athletes have achieved significant results at national and international level.

One of the city's sporting jewels has undoubtedly been Piacenza Calcio, the oldest and most important football club in the whole province of Piacenza. The team was born in the summer of 1919, as soon as Italy recovered from the horrors of the war and the desire to have fun and play returned.

Piacenza Football Club was founded by a group of students and workers who chose eighteen-year-old Giovanni Dosi as president. After affiliating to the Federation, the club entered the Emilian regional Promozione championship, choosing the colours of the city, white and red, as its club colours; the captain was the Milanese Mario Giumanini. In its first championship, 1919-20, Piacenza won straight away ahead of Parma and Spal, earning promotion to the Prima Categoria, then the top division, although not comparable to today's Serie A because the championships were divided into regional groups. In 1920-21, among the elite of Italian football, Piacenza finished 3rd in its Emilian group A and did not qualify for the later stages. In 1921-22, still in the top division, it won its Emilian group and went through to the next stage, again against Emilian teams, but finished no higher than 4th.

For the rest of the 1920s the team always achieved quite flattering placings in the Second Division (the regional Serie B of the time). In 1927-28, with the reform of the championships, it qualified for the First Division (still equivalent to a regional Serie B). In 1929-30 Serie A and Serie B were created; Piacenza did not qualify for Serie B and remained in the First Division, which had become the equivalent of a third tier, until Serie C was created in 1935-36. The team stayed there, apart from a few seasons in Serie B or Serie D, until the mid-1980s.

In 1930-31 Piacenza came very close to playing for admission to Serie B, but some questionable decisions by the Federation, which annulled two matches in Piacenza's favour, turned a probable first place (which would have given the chance to play for qualification) into third place. In those years one of the most important players in the club's history played for Piacenza, certainly the idol of the time: Giuseppe "Pitìn" Cella, a native of Piacenza, who is still the club's all-time top scorer. In 1937-38 Piacenza had another, much more concrete chance of promotion to Serie B: it finished the championship level in first place with Fanfulla of Lodi, and the two teams had to play a play-off to decide who would go up; unfortunately Piacenza lost 2-1. There were no significant results in the 1940s. From 1945-46 Piacenza played for three seasons in a Serie B that the Federation was determined to stage to restart sporting activity after the Second World War and which, for lack of teams, was in fact a tournament including both Serie B and Serie C teams (such as Piacenza).

In the 1951-52 season the Biancorossi dominated their group, but were beaten by Cagliari in the promotion play-offs with the other group winners. That year the nickname "Papaveri" (Poppies) was born, after Nilla Pizzi's well-known song "Papaveri e Papere".

After a few mid-table finishes, at the end of the 1955-56 season Piacenza was relegated to the Fourth Series because of an alleged fix with Piombino, which the Federation ruled a sporting offence. This was the season that established the Milan-trained striker Gastone Bean, who scored 23 goals in 21 matches. After two seasons in the Fourth Series, in 1957-58 the Biancorossi won promotion to Serie C, with the brothers Albino and Giancarlo Cella in the squad. The joy was short-lived, however: in 1960-61 Piacenza scaled down, selling Albino Cella among others, and went through a very troubled season. Coach Korostelev was sacked and replaced by surveyor Dario Cozzani, who was not a professional coach, and then by fitness coach Sergio Rampini, who managed to lift the team; but despite three wins in the last three matches, Piacenza was relegated to Serie D. In 1961-62 Piacenza aimed for promotion; the team coached by Ivano Corghi had a good season but had to settle for third place. Promotion did not come the following season either: Piacenza started badly but, with a good recovery in the second half of the season, reached a play-off group with Solbiatese and Rovereto, at the end of which the Lombard side went up. Piacenza finally left Serie D in 1963/64 under former "Papaveri" captain Francesco Meregalli.

After a few years of settling in Serie C, in 1967-68 the Biancorossi, led by the old glory Sandro Puppo and then by Leo Zavatti, launched an assault on promotion to Serie B but finished second, behind only Como. Promotion was only postponed to the following season, when under coach Tino Molina and president Vincenzo Romagnoli the club

returned to Serie B after 20 years. That year also saw the completion of the new Galleana stadium, leaving the historic Barriera Genova ground opened in 1920.

Serie B in 1969-70 was a wonderful moment in the club's history but also a wasted opportunity: Piacenza stepped into top-level football with an unsuitable team and went back down to Serie C after just one year. After a few rather disappointing years Piacenza tried again, and in 1974-75, under coach Giovambattista Fabbri and with a team of players who were not very well known but experienced and capable, it won Serie C by a distance, playing extremely modern football that thrilled the Piacenza public, and not only them.

Sports fans still remember Sandro Mazzola saying on "La Domenica Sportiva" in spring 1975, of the Piacenza side dominating Serie C, that Piacenza was the team playing the best football in Italy.

Once again, however, Serie B proved fatal: just one year and then back to Serie C. Despite this, and this too made the national news, after the last match GB Fabbri was carried in triumph by the Biancorossi fans. We had been relegated, but this Piacenza had excited everyone and we had enjoyed ourselves. All we had lacked was a real striker to score a few goals. A lean period followed, in which Piacenza alternated colourless seasons with slightly more interesting ones, but never truly exciting. Then in 1982-83 the team was relegated to Serie C2.

1983 marked the start of the golden age of Piacenza Calcio, thanks to the arrival of president Leonardo Garilli, a Piacenza-born methane industrialist, who brought about the club's rebirth. It climbed from Serie C2 to Serie B for two seasons, 1987-88 and 1988-89, returned briefly to Serie C and then, from 1990-91, began an extraordinary rise that took it to Serie A for the first time in 1993-94. In total it played 8 Serie A seasons and more than 10 in Serie B.

On 13 June 1993, by winning in Cosenza, Piacenza was promoted to Serie A for the first time in its history, and after 11pm a Galleana stadium full of celebrating fans was waiting for the Biancorossi flying back from Cosenza. The club's Serie A debut came on 29 August 1993 against Mondonico's Torino, who won 3-0 at the Galleana, while the first win came on the fifth matchday, 2-1 against Lecce. Despite the early difficulties, Cagni's team grew week by week, making the Galleana one of the toughest grounds in Serie A: after Torino, only Lazio managed to win in Piacenza. The Coppa Italia campaign was also remarkable, with the sensational elimination of multiple champions Milan, finished off by a Giampiero Piovani counter-attack.

An all-Italian team

Piacenza's Serie A side was built on self-reliance: the squad was made up of Italian players only, and remained so until the 2000-01 season. At the end of March survival seemed within reach, but a dip in form and Reggiana's comeback put everything back in question. On the penultimate matchday Juventus came to Piacenza: it ended 0-0, with two Biancorossi goals disallowed (scored by Moretti and Iacobelli), while Reggiana drew 1-1 at home with Sampdoria. Everything was left to the last matchday: the Biancorossi had to bring their match forward to the Friday because Parma were playing the Cup Winners' Cup final the following Wednesday. On Friday 29 April 1994 at Parma's Tardini it ended 0-0, with another goal disallowed, this time Ferrante's, while on 1 May 1994 Reggiana won at San Siro against Milan and survived at Piacenza's expense. But Piacenza won Serie B in 1994-95 and went straight back to Serie A. On 15 June 1997 came one of the most emotional moments in Piacenza's history: the play-off against Cagliari, played in Naples, to stay in Serie A. People still remember the coaches of Biancorossi fans who travelled down to Naples to support the team (more than 5,000 Piacenza supporters). Piacenza won and condemned Cagliari to Serie B. Three more seasons in Serie A followed, then another relegation, followed by a lightning return to Serie A. In 2001-02 survival was secured, and a Biancorossi player, Dario Hübner, was Serie A's joint top scorer with 24 goals, together with Juventus's Trezeguet. In 2002-03 the Biancorossi returned to Serie B.

A period of 8 years in Serie B began.

For the 2010-11 Serie B season the squad was built around loans, young players and free agents. There were several returns: Armando Madonna on the bench, Volpi and Cacia on the pitch. Another poor start to the season (2

points in seven matches) was gradually recovered, but a collapse in results in the spring led the club to the play-outs against AlbinoLeffe. Two draws meant relegation to Lega Pro Prima Divisione.

From relegation to the Prima Divisione to bankruptcy

Following the disappointment of relegation, and in dispute with the federal authorities for not suspending the competitions despite investigations into an illegal betting ring in which several Biancorossi players were implicated (which may help explain Piacenza's poor results in its last matches), the club's owners announced that they did not intend to enter Piacenza in any championship for the 2011-12 season. However, on 29 June the management changed its mind, and after 20 years Piacenza returned to the third tier, then called Prima Divisione.

On 28 October, after negotiations lasting several months, president Fabrizio Garilli sold Piacenza to a group of businessmen, but within a few weeks Fabrizio Garilli was back at the head of the club. On 22 March 2012 the company was officially declared bankrupt. On the pitch, the team lost the play-out against Prato and was relegated to Lega Pro Seconda Divisione. Twenty-nine years after the arrival of Leonardo Garilli, the Garilli family's time at the head of Piacenza came to an end, and Piacenza found itself in the fourth national tier, exactly where the "Ingegnere" had found it. But that was secondary. On 19 June 2012, with no buyers at the bankruptcy auction, Piacenza failed; only the trademark and name were bought at auction, by the supporters' association Salva Piace.

The rebirth and the arrival of the Gatti family

At the beginning of July 2012, thanks to the determination and support of brothers Stefano and Marco Gatti, Piacenza Calcio was reborn, strongly backed by the fans and with the approval of sporting and political institutions and the local community. The Gatti family, fans with strong ties to their home city, are shareholders of Steel SpA, a leading company in the trade of special steels. The Piacenza trademark was leased for 4 years to the newly formed "Lupa Piacenza", which at the end of the season was promoted from Promozione to the Emilia-Romagna Eccellenza.

The 2012-2013 season

The season of rebirth will go down in history as "the year of the Lupa": under the provisional name "Lupa Piacenza", the new team won the Eccellenza Emilia Romagna group A championship and was promoted to Serie D.

Piacenza Calcio 1919

In June 2013, following a public poll, Lupa Piacenza changed its name to Piacenza Calcio 1919 and prepared for the 2013-2014 season in Serie D, in which it finished 3rd. The following season, again in Serie D, ended with the Biancorossi in 3rd place.

The return to professional football

In the 2015-2016 season Piacenza Calcio returned to Lega Pro, dominating its championship, celebrating promotion as early as March and setting an all-time record for points (96) and goals scored. The following season the Biancorossi finished 6th, qualifying for the Serie B play-offs; the team reached the round of 16 at the end of a great season which, among its many wins, included a double triumph in the Derby del Po, the fourth in the history of this fixture. A new cycle began, a new project designed by the Gatti family to bring the club back to Serie B with a three-year growth programme for the first team and the youth sector.

3. Activities at risk of Offences

The activities at risk of Offences, as identified through a specific review carried out by the Company itself and as shown by the interviews annexed to the preparatory document for this Organisation Model, may potentially be carried out in the following areas ("Areas"):

- Obtaining funding and/or grants · Functions involved: Administration and Management · medium risk
- Obtaining concessions, licences and authorisations from the Public Administration · Functions involved: Secretariat, Administration and Management · medium risk
- Contractual negotiations with the Public Administration · Functions involved: Management · medium risk
- Corporate offences · Functions involved: Board of Statutory Auditors · medium risk
- Administering and managing staff · Functions involved: Management, Personnel Administration, Secretariat · medium risk
- Access to IT and electronic systems; computer crimes · Functions involved: all functions/offices of the Company · medium risk
- General relations with the Public Administration and with control and/or supervisory authorities · Functions involved: Board of Statutory Auditors, accountant, employment consultant, Administration, Management · medium risk
- Managing the website and using outsourcing · Functions involved: Press Office, Marketing · medium risk
- Health and safety at work · Functions involved: all functions/offices of the Company · medium risk
- Use of patents and industrial models, trade in general (fraud and false marks to the detriment of buyers), protection of industrial property · Functions involved: Management · low risk
- Receiving stolen goods, money laundering, use of money, goods or benefits of unlawful origin, self-laundering · Functions involved: Administration, Board of Directors, Management · low risk
- Environment · Functions involved: all functions/offices of the Company · low risk
- Employment of third-country nationals staying illegally · Functions involved: Secretariat, Management · medium risk
- Payments to and relations with public officials / persons in charge of a public service, active corruption · Functions involved: Secretariat, Management · low risk
- Private-to-private corruption · Functions involved: Board of Directors · low risk
- Accounting, preparation of draft financial statements, relations with shareholders, the Board of Statutory Auditors and the audit firm · Functions involved: accountant, Administration, Management · low risk

The company conduct constituting Offences that may occur in the course of the Company's activities is, by way of example only, that illustrated during the review to identify activities at risk of Offences and set out in the "Preliminary Review" document for building and implementing an Organisation Model.

4. Protocols for making and implementing decisions

(i) Process management

The review carried out by the Company established that, for the activities referred to in section 3 (Activities at risk of Offences), the Company is organised so that no one can manage an entire process alone and the principle of segregation of duties is applied: authorisation of a transaction (making the decision) is the responsibility of a person other than the one who carries out, records or checks the transaction (implementing the decision).

The procedures in force, and those annexed, are an integral part of the Organisation Model. In particular:

- no one is given unlimited powers;

- powers and responsibilities are clearly defined, without overlaps between functions, and are known within the organisation;
- the functions and tasks of those involved in the relevant stages of a potentially risky process are kept separate (for example, purchasing and finance);
- authorisation and signing powers are consistent with the organisational responsibilities assigned;
- spending authorisation thresholds are precisely set and made known;
- the system of responsibilities of top management is clearly defined and delegations, where they exist, are consistent with it;
- powers of attorney granted to act externally are consistent with the system of delegations;
- the system of powers of attorney explicitly excludes "requesting money or other benefits from third parties";
- powers of attorney, where they exist, are made known to external counterparties;
- the power to represent the Company towards all third parties is granted by formal and registered acts.

(ii) Accounting records

Every operation, transaction and action must be:

- lawful, consistent, appropriate, authorised and verifiable;
- correctly and adequately recorded, so that the lawfulness, consistency and appropriateness of the decision, authorisation and execution process can be checked; recording may only take place when all the required documents and/or controls are in place;
- supported by documents that allow, at any time, checks on the characteristics and reasons for the operation and identification of who authorised, carried out, recorded and checked it.

(iii) Controls

Regular checks are carried out on:

- the Company's financial flows;
- company documentation and, in particular, supplier invoices, checking that each payment corresponds to a genuine transaction with the Company and is consistent with it;
- external collaborators;
- the genuineness and truthfulness (formal and substantive) of documents submitted to the public administration for any purpose;
- documentation to be submitted for fundable projects (both project documents and those certifying the Company's technical, economic and professional requirements);
- employees and external collaborators involved in purchasing goods and services for the Company;
- recruitment and management of staff in the areas identified as at risk of Offences.

The performance of checks, including supervisory checks, is documented (through minutes or in another equally effective way).

5. Protocols on financial statements and corporate matters

(i) Preparation of the financial statements and similar documents

The review carried out by the Company confirmed that the following activities are carried out in advance when preparing the financial statements:

- all functions receive written instructions on the data and information they must provide to the administration office, and on the checks to be carried out on items provided by the administration office and to be confirmed to it;
- heads of function who provide data and information for the financial statements and similar documents must sign a declaration that the information transmitted is true and complete. These declarations certify what the person responsible can objectively and concretely demonstrate with documents (including following an ex post check) on the basis of the data they hold, avoiding general and generic statements;
- the Supervisory Body holds regular meetings with the head of administration on the financial statements, with minutes signed by the participants, including any in-depth documentary analysis of particularly significant and complex items in the draft financial statements;
- the Supervisory Body holds at least one meeting a year with the Board of Statutory Auditors on the financial statements (and the related notes), with minutes signed by the participants.

(ii) Company law

At least one meeting a year is held between the Board of Statutory Auditors, the head of administration and the Supervisory Body to check compliance with company law and the resulting conduct of directors, managers and employees.

6. Management of financial resources

(i) Segregation of duties

The function that manages financial transactions, both outgoing and incoming, is separate from every other function.

This function carries out each transaction:

- on the written request of the function concerned;
- after obtaining the prior written authorisation of the functions delegated for this purpose:
  - where the transaction exceeds the amounts specifically set in the powers of attorney granted to those acting in the Company's interest;
  - where the transaction is requested by an Area.

(ii) Planning

Each function plans its financial requirements in writing for specific transactions and communicates them to the function that manages financial transactions.

(iii) Execution of transactions

The following are provided for and carried out:

- regular and orderly accounting of every outgoing and incoming financial transaction;
- periodic statements (at least quarterly) of all outgoing and incoming transactions;
- reconciliations of total outgoing and incoming flows.

(iv) Specific monitoring

Specific monitoring is carried out on financial resources allocated to the following activities and transactions, to prevent them being allocated for the purpose of committing an Offence:

- activities carried out by the Areas;
- transactions relating to activities or services that are atypical or unusual in relation to the Company's business;

- expenses incurred, or for which reimbursement is requested, by bodies, employees and external collaborators working in or for the Areas;
- financial transactions carried out in unusual ways, such as delegation of payment, novation, assumption of debt, assignment of receivables, set-off, etc.

In particular, it is checked that every transaction is:

- specifically and clearly justified;
- appropriate;
- documented;
- supported by a proper receipt (for outgoing financial transactions).

7. Protocols and measures for preventing other Offences and carrying out controls

(v) Health and safety at work · Environment

The Company has adopted procedures, whose observance is monitored by the Head of the Prevention and Protection Service (RSPP) and the Employer, to ensure:

- compliance with legal technical and structural standards for equipment, installations, workplaces and chemical, physical and biological agents;
- risk assessment and preparation of the resulting prevention and protection measures;
- organisational activities such as emergencies, first aid, management of contracts, periodic safety meetings and consultation of workers' safety representatives;
- health surveillance;
- information and training of workers;
- supervision of workers' compliance with safe working procedures and instructions;
- acquisition of documents and certificates required by law;
- periodic checks on the application and effectiveness of the procedures adopted;
- adoption of suitable systems for recording that the above activities have been carried out.

These tasks are assigned to the RSPP.

Failure to comply with the measures set out in the procedure is sanctioned under section 8.

The Risk Assessment Report, as an integral part of the Organisation Model, is subject to review and, where necessary, amendment when the conditions arise, in particular when significant breaches of the rules on accident prevention and workplace hygiene are discovered, or when changes occur in the organisation and activity in connection with scientific and technological progress.

The safety and environmental protocols, procedures and operating instructions in force from time to time are an integral part of this model.

(vi) Anti-money laundering · Self-laundering

Procedures are in force for:

- checking the regularity of payments, with reference to full correspondence between the payees/payers and the counterparties actually involved in the transactions;
- in particular, formal and substantive checks on the Company's financial flows that take into account the counterparty's registered office (e.g. tax havens, countries at risk of terrorism, etc.) and the banks used;

- checking compliance with cash payment thresholds and any use of bearer or anonymous passbooks to manage liquidity, etc.;
- promptly informing the Supervisory Body and the management control bodies of possible breaches relating to recording and reporting obligations and to limits on the use of payment and deposit instruments (cash, bearer securities, anonymous savings accounts and passbooks or those in fictitious names);
- determining the minimum requirements for bidders and setting criteria for evaluating bids in standard contracts;
- checking the extent to which subsidiaries have put anti-money laundering measures and controls in place.

(vii) Relations with the Public Administration

Protocols are in force for managing relations with the Public Administration, within the general principles and prohibitions set out in the Code of Ethics.

Anyone dealing with the Public Administration for negotiating purposes on behalf of the Company must be formally given that power by the Board of Directors or the delegated bodies.

Adequate documentation of all significant relations with the Public Administration must be kept and made available to the Supervisory Body.

The assessment of whether it is economically worthwhile to take part in public procedures is carried out by the Board of Directors or the delegated bodies.

The Chairman of the Board of Directors, or a person formally delegated by them, is authorised to sign contracts.

Any critical issue arising in relations with public bodies must be reported to the Supervisory Body in a specific written report.

(viii) Other measures

Instructions containing clear and unequivocal reminders about the proper use of the IT tools available to employees are issued and made known to all of the Company's employees. With regard to the processing of personal data, company privacy procedures are in force that describe the physical protection of data, the use of information systems and specific controls, and define the functions responsible for those systems.

A sales and purchasing process is in place, described in the company procedures.

An operational process for checking the staff of contractors is in place.

A programme of inspection visits to suppliers and partners is planned and carried out to check compliance with the commitments in the Code of Ethics, or all relevant documentation is requested from them.

The Company has IT tools that prevent access to and/or receipt of material relating to child pornography.

The direct and/or indirect organisation of trips or stays abroad is assessed with particular care and sensitivity, with specific regard to destinations known for so-called "sex tourism".

The possibility of commercial partnerships is carefully assessed in advance in order to exclude companies operating in sectors such as the electronic distribution of material relating to child pornography and tourism in the geographical areas referred to in the previous point.

Control measures exist at the recruitment stage to prevent the offence of employing third-country nationals staying illegally.

8. Disciplinary system

The disciplinary system is intended to prevent and sanction, from a contractual point of view, the commission of administrative offences resulting from the crimes referred to in Legislative Decree no. 231/2001.

Sanctions are applied regardless of whether criminal proceedings are opened by the judicial authorities, and of their outcome, where the conduct to be sanctioned constitutes an offence relevant under Legislative Decree no. 231/2001.

This disciplinary system, as provided for by the organisation and management model, complements and does not replace the disciplinary system set out in the national collective employment agreement (CCNL) in force and applied.

To make the disciplinary system suitable and therefore effective, consideration will also be given to sanctioning mere conduct that puts at risk the rules, prohibitions and procedures of the model, and even preparatory acts aimed at breaching them.

This disciplinary system applies to employees, members of the Board of Directors, members of the Board of Statutory Auditors, consultants, collaborators, suppliers, contractors and subcontractors, agents and third parties in general who have contractual relations with the Company.

For persons bound to the Company by an employment relationship, the disciplinary procedure for breaches of the organisation model is the one governed by law and by the CCNL in force and applied.

For third parties contractually bound to the Company by a relationship other than employment, the disciplinary procedure will be managed by top management on a report from the Supervisory Body (OdV), and the right of termination may be exercised in accordance with the contractual clauses.

For members of the Board of Directors and the Board of Statutory Auditors, the body to which they belong will also be involved.

The procedure for imposing the sanctions under this disciplinary system takes account of the particular legal status of the person concerned.

In any case, the Supervisory Body must be involved in the disciplinary procedure.

Establishing breaches of the organisation model is the responsibility of the Supervisory Body, which must promptly report established breaches to top management.

A dedicated information channel is to be set up to facilitate the flow of reports to the Supervisory Body on breaches of the provisions of this organisation model.

All addressees must be informed of the existence and content of this disciplinary system. Top management, together with the Supervisory Body, is responsible for communicating it.

All breaches of the principles and rules contained in the organisation model and in the procedures governing activities potentially exposed to the commission of predicate offences are sanctioned.

1. Disciplinary measures

Disciplinary offences are punished, according to their seriousness, with the following measures:

- verbal warning;
- written warning;
- fine of up to three hours' pay;
- suspension from work and pay for up to three days;
- dismissal with notice;
- dismissal without notice.

For disciplinary measures more serious than a verbal warning or reprimand, the worker must be notified of the charge in writing, with a specific statement of the facts constituting the offence.

The measure may not be adopted until eight days have passed from that notification, during which the worker may submit their justification. If the measure is not adopted within the following eight days, the justification is deemed accepted. For this purpose, the eight days within which the measure must be adopted follow the first eight days, so the measure must be adopted within sixteen days of the charge. The measure must be adopted within sixteen days of the charge even if the worker submits no justification.

If the offence charged is serious enough to lead to dismissal, the worker may be suspended from work as a precaution until the measure is imposed, while retaining the right to pay for that period.

The imposition of the measure must be reasoned and communicated in writing.

The worker may also submit their justification verbally.

Disciplinary measures other than dismissal may be challenged by the worker through the trade union channel, in accordance with the contractual rules.

Disciplinary sanctions are disregarded for all purposes two years after they were applied.

2. Breach of the rules of the Code of Ethics and of the procedures annexed to the organisation and management model

Breach of the rules of the Code of Ethics and of the procedures annexed to, referred to in or adopted to implement the organisation and management model, and failure to comply with company law, constitute a disciplinary offence by the person(s) responsible for implementing the measure.

In particular, the following constitute disciplinary offences punishable with the sanctions set out above, according to the seriousness of the breach and the responsibilities connected with the employee's position:

- failure to observe one or more of the principles or provisions of the Code of Ethics;
- failure to comply, even in part, with the provisions of one or more procedures annexed to the organisation and management model;
- missing, incomplete or untrue documentation of control activities carried out in implementation of and in accordance with the organisation and management model;
- breach of the principles guiding the Company's activity;
- missing, incomplete or untrue documentation of the monitoring of financial resources carried out in implementation of and in accordance with the organisation and management model;
- breach or circumvention of the control system, by removing, destroying or altering the documentation required by the procedures of the organisation and management model, obstructing controls, unjustifiably preventing those responsible for controls, including the Supervisory Body, from accessing information and documentation, or other conduct capable of breaching or circumventing the control system;
- failure to cooperate with the Supervisory Body.

The seriousness of the breach will be assessed on the basis of: the timing and actual manner in which it was committed, the presence and intensity of intent, the extent of the damage or danger resulting from the breach for the Company and for all its employees and stakeholders, the foreseeability of the consequences, and the circumstances in which the breach took place.

Repeat offending is an aggravating factor and leads to a more serious sanction.

The sanctions that may be imposed are as follows:

- for employees: verbal warning, written warning, suspension or dismissal, depending on the seriousness of the breach;
- for executives: written warning or dismissal with or without notice, depending on the seriousness of the breach. In particular, an executive will incur the most serious sanction of dismissal without notice whenever the breach of one or more provisions of the model is so serious as to irreparably damage the relationship of trust between executives and the Company;
- for directors: adoption by the Board of Directors of the measures provided for by law and/or the Articles of Association, graduated according to the seriousness of the breach up to submitting a proposal for removal to the Board of Directors. In any case, the Supervisory Body will inform the Board of Directors and the entire Board of Statutory Auditors without delay and in writing;
- for members of the Board of Statutory Auditors: adoption by that body and by the Board of Directors of the measures provided for by law and/or the Articles of Association, graduated according to the seriousness of the breach up to submitting a proposal for removal to the Board of Directors. In any case, the Supervisory Body will inform the Board of Directors and the entire Board of Statutory Auditors without delay and in writing;
- for self-employed workers, consultants, collaborators, suppliers, contractors and subcontractors, agents and third parties in general with contractual relations with the Company: termination of the contract without notice under a specific clause that must be included in every agreement and contract, with the following or equivalent wording: "In carrying out the activities covered by this contract, the Company's contracting party (that is, as the case may be, the consultant, supplier, subcontractor, agent, etc.) undertakes to observe the principles and provisions of the Code of Ethics, the company policy and the organisation and management model, which form an integral and essential part of this contract. Compliance with the laws and regulations in force is an essential principle for the Company, which prohibits conduct in breach of them, in particular the unlawful conduct covered by Legislative Decree no. 231 of 8 June 2001. If the Company's contracting party fails to honour this commitment, the Company reserves the right to terminate the contract, without prejudice to its right to compensation for damages". Conduct in breach of the rules of the organisation model will be assessed by the Supervisory Body which, after hearing top management and issuing a formal warning, will report promptly and in writing to the Board of Directors and the Board of Statutory Auditors. As provided in the clause above, the Company reserves the right to claim compensation if such conduct causes it actual material or reputational damage.

Breaches constituting or connected with the offences of child prostitution and child pornography are particularly serious and are therefore punishable with the maximum disciplinary sanctions.

The Code of Ethics, the Procedures, non-compliance with which is sanctioned, and the disciplinary system are formally declared binding on all employees, including through internal circulars or formal notices, and are displayed, as required by Article 7(1) of Law no. 300/1970, "by posting in a place accessible to all".

9. Supervisory Body

The task of monitoring the functioning of and compliance with the Organisation Model and of keeping it up to date is entrusted to a specific body (the "Supervisory Body").

1. Requirements

To carry out its tasks properly, the Supervisory Body meets the following requirements and operates with the following characteristics:

- professionalism, in terms of qualifications and professional experience;
- capacity to hold the office, meaning not being legally incapacitated, bankrupt or convicted with a penalty involving disqualification, even temporary, from public office or incapacity to hold management positions;

- good repute, specifically:
  - enjoying full civil rights, being of irreproachable conduct and not having received, even by non-final judgment, any conviction or ancillary penalty for any of the Offences;
  - not having been convicted, even by non-final judgment: of simple or fraudulent bankruptcy, abusive recourse to credit, reporting non-existent creditors or other failures by a bankrupt to meet their obligations under bankruptcy law; of any offence under the rules governing banking, financial, securities and insurance activities and the rules on markets, securities and payment instruments; of a crime against the public administration, public trust, property or the public economy, or a tax crime; of any intentional crime punishable by imprisonment of not less than two years; or of any of the offences under the criminal provisions of the Civil Code on companies and consortia;
  - not having been a member of the Supervisory Body of Entities on which the sanctions provided for by the Decree were imposed for offences committed while they were in office;
  - not having been subject to the preventive measures of special police supervision and compulsory residence in the municipality of residence or habitual abode provided for by anti-mafia legislation;
  - not having incurred the ancillary administrative sanctions of temporary loss of the good repute requirements and temporary incapacity to hold administrative, management and control positions under Article 187-quater of Legislative Decree no. 58/1998;
- independence from the management of the Company, namely:
  - not being the spouse, partner, relative or in-law up to the second degree of an executive director of the Company, or the spouse, partner or first-degree relative of a person in those situations, and not having economic relations, directly, indirectly or on behalf of third parties, with the Company, its subsidiaries or its executive directors significant enough to affect their independence of judgement;
  - not holding, directly, indirectly or on behalf of third parties, rights and/or relationships that allow control or significant influence over the Company;
  - not being party to shareholders' agreements for control of the Company;
  - not being bound to the Company, or to companies or entities it controls or in which it holds interests or which are under common control, by a continuous consultancy or paid service relationship or other financial relationships that compromise their independence, and not being otherwise in a conflict of interest with it;
- appointment by the top governing body;
- term of office of not less than three years, renewable once only, subject to forfeiture if the requirements set out in this and the two previous points cease to be met, or removal for just cause;
- the activities of the Supervisory Body cannot be reviewed by any other body or structure of the Company, without prejudice to the governing body's responsibility for the adequacy of the Supervisory Body's work;
- autonomy, meaning reporting to the highest operational level of the Company and not being given operational tasks that could undermine, through participation in decisions or their execution, its objectivity when checking behaviour and the Organisation Model;
- free use of financial resources, allocated on the basis of a spending estimate proposed by the Body itself and approved as part of the Company's budgeting procedures, for every need required to carry out its tasks properly (e.g. specialist consultancy, travel, etc.), with the power to commit resources beyond those allocated when necessary to deal with exceptional and urgent situations, with the obligation to inform its reporting line without delay;
- all the powers necessary to carry out the functions described in point 2 below, including in particular free access to all the Company's records and documents and the power to obtain from any employee the

information and documents requested, provided they are strictly related to the proper performance of the Supervisory Body's mandate and specifically to the functioning, observance and updating of the Organisation Model (the "Information" and the "Documents");

- adequate resources, with the freedom to organise itself at its own discretion, to devote the time it considers necessary to supervision and to use internal and/or external specialist professionals;
- continuity of action, specifically regular interventions both at the Company and externally, minutes (even brief) of every meeting, collection, cataloguing and archiving of documentation, and reports to its reporting line at least quarterly.

2. Activities

The Supervisory Body carries out the following activities:

- it monitors the efficiency and effectiveness of the Organisation Model, that is, it checks that actual behaviour is consistent with the model established. To this end it:
  - carries out inspections in ways predetermined and approved by the governing body;
  - has access to all Documents prepared for the purposes of the Company's Organisation Model;
  - may request Information from directors and any other senior person;
  - may request Information from all employees and managers of the company working in the risk areas, even without prior authorisation from the governing body;
  - may request Information from the head of management control and internal control;
  - may request Information from external collaborators, consultants, agents and representatives outside the Company;
  - may examine the documentation relating to the Company's activities in the Areas;
  - periodically receives Information from the specifically identified heads of the Areas;
  - proposes the start of the disciplinary procedures set out in section 8;
  - reports to the governing body, for appropriate action, established breaches of the Organisation Model that could give rise to liability for the Company;
  - at the end of every inspection, information or proposal activity, draws up detailed minutes, recorded in a dedicated book and communicated to the governing body and to the Chairman of the Board of Statutory Auditors;
  - regularly prepares a written report on the activities carried out, sent to the governing body and to the Chairman of the Board of Statutory Auditors and recorded in a dedicated book;
- it examines the adequacy of the Organisation Model, that is, its real (and not merely formal) ability to prevent, in principle, unwanted behaviour;
- it analyses whether the Organisation Model remains sound and functional over time;
- it ensures the necessary dynamic updating of the Organisation Model where its analyses show that corrections and adjustments are required as a result of:
  - significant breaches of the provisions of the Organisation Model; or
  - significant changes in the Company's internal structure and/or in the way it conducts its business; or
  - changes in the law.

This updating normally takes place in two distinct and integrated stages:

- submitting proposals to adapt the Organisation Model to the company bodies and functions able to put them into practice. Depending on the type and scope of the changes, proposals will be addressed to the Personnel

and Organisation, Administration and other functions or, in some particularly significant cases, to the Board of Directors;

- checking the implementation and actual effectiveness of the solutions proposed.

In addition, the Supervisory Body:

- reports breaches of the Code of Ethics and the Procedures by directors to General Management and the Board of Statutory Auditors;
- brings to the attention of the shareholders, possibly at the Board meeting approving the financial statements, any irregularities where serious misconduct by the Board of Directors, its members or the statutory auditors is suspected.

The Supervisory Body governs the performance of the above activities through specific rules of procedure (scheduling of activities, minutes of activities carried out, rules on information flows from company structures to the Body, identification of analysis criteria and procedures, etc.).

10. Information to the Supervisory Body

The bodies and employees of the Company working in the Areas must inform the Supervisory Body of:

- the periodic results of the control activities they carry out to implement the Organisation Model (summary reports of activities, monitoring, final indicators, etc.);
- any anomalies or irregularities found.

By way of example, the obligation to inform covers:

- activities relating to and resulting from applying for, receiving and using public funding;
- awarding of contracts following national and/or European tenders or private negotiation;
- orders awarded by public bodies or entities performing functions of public utility;
- requests for legal assistance from bodies and employees against whom the judicial authorities are proceeding for Offences;
- measures and/or information from the judicial police or any other authority indicating that investigations are being carried out, even against unknown persons, for Offences;
- commissions of inquiry or internal reports revealing liability for Offences;
- periodic reporting on health and safety at work;
- information on the actual implementation of the Organisation Model at all company levels, showing the disciplinary proceedings carried out and any sanctions imposed, or decisions to close such proceedings with the reasons.

Information on the subjects in the first, second, third, seventh and eighth points must be provided through summary statements at intervals of no more than six months.

The Company's bodies, employees and external collaborators must inform the Supervisory Body of any breach of the Organisation Model of which they become aware. Everyone is guaranteed:

- full freedom to contact the Supervisory Body directly to report breaches of the Organisation Model or any irregularities; and
- exemption from disciplinary sanctions and protection from retaliation of any kind, except only for improper reports, in terms of content or form, which remain subject to sanctions under the contract or company practice.

11. Structure of this Organisation Model

Annexed to this Organisation Model is:

- the text of the provisions giving rise to the liability of Entities for Offences (Annex 1).

The company procedures, in the version in force from time to time, form an integral part of the Model whenever they are added, amended or replaced.

The 2017 Preliminary Review document, supplemented by its annexes, is the preparatory document for this Organisation Model.

Annex 2 · Procedure for managing the contracts of registered members

PROCESS MAP · PLAYERS, TECHNICAL STAFF AND MANAGERS

In the original this procedure is a flowchart. Each step below gives the activity, the person primarily responsible, a description, and the supporting tools where stated.

1. Start · Identifying a potential player or coach

Responsible: Sporting Director (DS).

As head of the technical area, the Sporting Director identifies the profiles to lead the team (head coach, fitness and goalkeeping coaches, other registered staff) and the players whose characteristics may interest the club in light of its sporting objectives, quality and cost.

Supporting tools: watching matches (scouting), scouting information tools (Wyscout).

2. Preliminary economic analysis

Responsible: General Manager (DG).

The Sporting Director shares the technical choices, and the financial requests are assessed against the club's available budget.

Supporting tools: watching matches (scouting), scouting information tools (Wyscout).

3. Outcome of the preliminary analysis

Responsible: Chairman of the Board of Directors.

The assessments carried out jointly by the DS and DG, based on technical, qualitative and economic values, are shared with the Chairman.

- Does the Chairman agree? No: the process stops. Yes: the process continues.

4. Formalising the contract

- Does the Chairman accept the proposal? No: negotiation continues or the process stops. Yes: the process continues.

Responsible: General Secretary.

The General Secretary prepares the registered member's federal contract on the basis of the financial terms agreed with the agent. Where the player's agent acts as intermediary in the negotiation, they are entitled to between 3% and 5% of the gross value of the fixed annual salary.

5. Legal review

Responsible: the club's lawyer.

The Secretary sends the contract to the club's lawyer for a general review.

- Is the contract correctly drafted? No: the contract returns to the General Secretary with the legal points to be examined or corrected. Yes: the process continues, after checking the ethical requirements under Legislative Decree no. 231/01.

6. Signing the contract

Responsible: Head of Administration.

The contract is signed by the registered member and by the Chairman of the Board of Directors. When signing the contract, the player also signs and accepts the Club's internal regulations, the Club's Code of Ethics and the Code of Ethics of the League.

Supporting tools: contract forms of the Italian Football Federation; Code of Ethics; internal regulations.

7. Lodging the contract · End

Responsible: General Secretary and Head of Administration.

The Secretary sends ("lodges") the contract with the FIGC and the competent League. The Head of Administration records the contract and sends it to accounting.

Supporting tools: online platform for lodging contracts.

Annex 3 · Procedure for managing relations with the fans

PROCESS MAP

In the original this procedure is a flowchart. Each step below gives the activity, the person primarily responsible, a description, and the supporting tools where stated.

1. Start · Risk assessment

Responsible: Supporter Liaison Officer; Delegate for Event Management (matchday operations).

Identification of the main risks relating to fans' behaviour inside the stadium:

- violent incidents;
- pitch invasion;
- discriminatory and/or offensive statements or behaviour towards individuals or institutions (chants, banners, etc.);
- use of pyrotechnics.

Supporting tools: legislation in force on safety at sports venues.

2. Preparing tools to prevent the risks

Responsible: Supporter Liaison Officer; Delegate for Event Management; General Secretary.

Adoption of the main tools intended to prevent the risks:

- stadium Regulations;
- Code of Ethics;
- Regulations on the transfer of tickets to the sports venue.

Supporting tools: legislation in force on safety at sports venues.

3. Approval of the prevention tools

Once prepared, these tools are submitted for assessment by the competent bodies and institutions.

- Opinion of the competent bodies: changes requested, so the documents are supplemented or amended on the basis of the requests and/or guidance of the competent authorities; or positive, so the process continues.

4. Publication and display

Responsible: the Club.

- publication of the documents on the Company's official website;
- display of the stadium Regulations inside the stadium.

5. Signature and acknowledgement

Responsible: the fans.

When buying a season ticket and/or a ticket for a single event, the fan declares that they have read and accept:

- the stadium Regulations;
- the Code of Ethics;
- the Regulations on the transfer of tickets.

6. Prevention and control activities

Responsible: Supporter Liaison Officer.

As the Club's delegate for relations with the fans, the SLO carries out prevention, monitoring and support activities through internal and external channels, to ensure compliance with the regulations and prevention.

7. Where breaches are identified

Responsible: stadium announcer.

- reading of anti-violence messages;
- announcements when incidents contrary to the stadium Regulations and the Code of Ethics occur.

Supporting tools: public address system.

8. Reporting offenders · End

Responsible: the Club.

Any breaches of the stadium Regulations and/or the Code of Ethics are reported to the police.

Annexes not translated

Annex 1 · Provisions giving rise to the liability of Entities for Offences

This annex (pages 53 to 99 of the Italian original) reproduces the text of Legislative Decree no. 231/2001 and the provisions of the Italian Criminal Code and other laws to which it refers, as they stood in 2020. It is the text of Italian legislation and has not been translated. Official and up-to-date texts are available on Normattiva (www.normattiva.it).

Annexes 4 and 5 · Covid-19 risk management procedure and protocol

The Covid-19 risk management procedure (rev. 3 of 30/04/2020) and protocol (rev. of 19/05/2020) were temporary measures adopted during the pandemic and are no longer in force. They have not been translated.