



### **Italian Legislative Decree 231/2001**

Pursuant to the Italian Legislative Decree no. 231 on the administrative liability of companies, Leonardi has implemented an Organisation, Management and Control Model which ensures accuracy and transparency when conducting business and aims to prevent crimes committed in the interest of or to the advantage of the company.

According to Italian Legislative Decree no. 231 of 8 June 2001, companies and all organisations in general may be called to respond in criminal proceedings, and therefore incur sanctions, to any crimes committed in their interest or benefit by the directors, employees and other parties who operate in the name or on behalf of the organisation or company. In particular, the Decree considers crimes in relationships with the Public Administration, corporate crimes, crimes linked to safety in the workplace and the environment, organised crime, terrorism, cyber crime, crimes against industry and commerce, crimes against individuals etc. To minimise the risk of these crimes being committed, each company is obligated to implement an “Organisation and Management Model”, that is, a set of regulations and procedures, including the adoption of a Code of Ethics and set of Anti-Corruption Guidelines, the establishment of a Supervisory Board and implementation of a control and sanctions system. The adoption and effective implementation of the Model and the appointment of the Supervisory Board allow the organisation to benefit from the hold harmless clause in the event of crimes.

The Leonardi “Model 231” is a dynamic and shared document. It is dynamic because it is sensitive to all regulatory and organisational changes. It is shared because its creation involves all of the company population, both in the phase prior to drafting, via the risk assessment, and in the implementation phase, through training and information.

### **Supervisory Board of Leonardi S.P.A**

The Supervisory Board of the Company (hereafter referred to as SB) is a monocratic body, provided with powers of initiative and control, whose member, selected by the Board of Directors, must possess the traits of autonomy, independence, professionalism, continuity of service and integrity. The SB is tasked with duties of supervising compliance with the provisions of the Model, the effectiveness of the Model and the opportunity to update it, in addition to operative duties linked to the application of the Model.

The Board of the Company Leonardi S.p.A. is composed of one external member, the lawyer Simonini.

### **Monitoring and updating the Model**

All areas at risk of crimes being committed pursuant to Italian Legislative Decree 231 and the rules of conduct in the Model are the product of an analysis of corporate documentation and meetings with personnel, in order to adapt the Model to the characteristics of the Company.

The Leonardi Model undergoes continuous assessment to evaluate its efficiency and guarantee it is updated according to internal changes (in the organisational structure, in business activities...) and external changes (legislative changes, best practices...).

### **Training and information**

The training of personnel is an essential element for the efficient implementation of the Model. Therefore, a training plan has been devised which includes both classroom sessions and e-learning modules with diversified content based on the addressees and which uses concrete examples. For the purposes of evaluating the quality of teaching, upon completion of the courses, tests will be distributed on the subjects of the lesson.

### **Reporting Violation of the Organisational and Management Model**

**Sede legale: Leonardi & C. S.p.A.**

Via Henry Dunant 10/12/14 – 41049 Sassuolo (MO)

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Società soggetta ad attività di direzione e coordinamento da parte di Savino Del Bene S.p.A.



Reports of violation of Model 231 can be sent electronically to:  
organismodivigilanza@pec.leonardi.it or via post to the following address:  
Leonardi S.p.A. – Supervisory Board Model 231  
Via Henry Dunant 10/12/14  
41049 Sassuolo (Modena)  
Furthermore, the whistleblowing portal has been made available on this site:  
[www.leonardi-group.it/Compliance/](http://www.leonardi-group.it/Compliance/)