



LEGISLATIVE DECREE NO. 231/2001 - COMPLIANCE INFORMATION

In accordance to the Legislative Decree No. 231 (issued on June 8, 2001), the Italian law now recognizes juridical persons (companies and associations) as criminally accountable for some offences perpetrated or attempted by officers, employees, and individuals subject to the company's direction or supervision, according to their interest or benefit; such criminal accountability is added to the physical person's who has perpetrated the crime.

If the Company has provided and put into effect examples of organization, direction, and control that could have prevented the crime itself before the commission of the offence, the Company is not accountable.

Complying to the Legislative Decree 231/01, and to ensure the fairness and transparency of the company business and activities, ANDRITZ Sovema S.p.A. adopted its Model of Organization, Direction, and Control (ex. 231/01, hereafter also referred to as "Model") and has established the Surveillance Committee (Organismo di Vigilanza).

Related to the Model are also the [Code of Conduct and Ethics](#) (i.e. the values and basic principles of the ANDRITZ Sovema S.p.A. management), the [Supplier Code of Conduct and Ethics](#), and the Disciplinary System (reported within the Model itself), whose aim is to sanction the cases where the Model and or the Code of Conduct and Ethics are not observed.

The Surveillance Committee, which consists of three members appointed by the Management Board, has the task of ensuring the Model's application and pointing out when it needs to be revised.

It is possible to report any notifications and/or violations of the Model by connecting to the website [AdvoWhistle – Welcome](#)

All reports will be handled in full compliance with [Italian Whistleblowing Regulations](#) (protection of whistleblowers' confidentiality) and privacy protection (EU Regulation 2016/679).

