



Acciaierie Bertoli Safau S.p.A. has adopted the Organisational Model pursuant to Legislative Decree 231/2001.

The main purpose of this Model is to prevent the committing of certain and specific offences identified in the Legislative Decree, by means of sensitive processes and related control activities.

To this end, a Supervisory Body (SB) has been set up. This Body, internal to the Company but with an autonomous position, has the task of supervising compliance with the Organisational Model and ensuring that it is updated, and at the same time has autonomous powers of initiative and control.

Among the main powers of the SB it is worth mentioning, by way of example, that the same:

- has access to all company documents and information relevant to the performance of the functions assigned the Body, which will be processed in full compliance with all laws and regulations, including but not limited to Regulation (EU) 2016/679 on the protection of individuals with regard to the Processing of Personal Data, as well as on the free movement of data (GDPR) and to the Personal Data Protection Code pursuant to Legislative Decree 196/2003 and subsequent amendments (Privacy Code);
- may request the recipients of the Model to promptly provide the information, data and/or news necessary to identify aspects related to the various company activities relevant to the Model and to verify its effective implementation.

The Supervisory Body currently in office is composed as

follows: Dr. Marco Della Putta (Chairman)  
Dr. Andrea Berni  
Dr. Pierpaolo Bonetti

The Organisational Model, together with the code of ethics and conduct that forms an integral part of the same, is published on the company notice board, on its intranet portal and can also be found on the website [www.absacciai.com](http://www.absacciai.com) in a simplified version.

As provided for by the Model, reports must be made in writing, preferably through the email address [odv@absacciai.com](mailto:odv@absacciai.com). Reports may also be made anonymously and sent to the postal address Acciaierie Bertoli Safau Spa.- Organismo di Vigilanza, via Buttrio 28, frazione Cargnacco (UD).

A dedicated email address is active for this purpose: [odv@absacciai.com](mailto:odv@absacciai.com)

Further aspects and specifications are regulated in detail within the Organisational Model.

Acciaierie Bertoli Safau S.p.A.

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Società soggetta a direzione e coordinamento da parte della Danieli & C. Officine Meccaniche S.p.A.