

MODEL 231

We have adopted an Organization, Management and Control Model (“Model 231”) which sets out behavioral rules and identifies control measures to be implemented in order to prevent the risk of committing crimes as provided for by Legislative Decree 231/2001 by the Company's personnel in the interest or for the benefit of the Company.

Model 231 is composed of a General Part and a Special Part, divided into various sections.

The General Part outlines the contents of Legislative Decree 231/2001, the purposes of Model 231, the functioning of the Supervisory Body, and the disciplinary system. The sections of the Special Part—each corresponding to a category of crimes considered relevant in relation to the sensitive activities carried out by the Company—describe the types of crimes and how they could concretely occur, the behavioral principles to be followed, and the measures adopted by the Company to prevent potential unlawful conduct.

The documents comprising Model 231 are accessible to all employees:

- By accessing the company intranet at the section: <https://opibox.castelli1938.com/s/9ig8rCaEK6QzWnn>
- By consulting the hard copy available at the Workers and Employees entrances.

Model 231 constitutes an internal company regulation in all its parts, valid and binding for all employees, collaborators, suppliers, and clients of the Company, regardless of the contractual classification and/or the type of collaboration, service, or supply relationship.

It is therefore the responsibility of each recipient to be familiar with the Model 231 adopted by the Company and to strictly comply with the principles and provisions contained therein, with particular reference to the Code of Ethics, protocols, and referenced procedures.

Violation of the provisions of Model 231 constitutes a disciplinary offense and is subject to sanction as set out in the disciplinary system of the General Part of the Model, in accordance with Article 7 of the Workers’ Statute and the provisions of collective and individual employment contracts.

SUPERVISORY BOARD

An external supervisory board, referred to as the Supervisory Board (O.d.V.), has been established. It holds autonomous powers of initiative and control and is responsible for overseeing the proper implementation and effective compliance with Model 231 by all company personnel.

The Company invites all employees to fully cooperate by providing any information and documentation requested by the Supervisory Board.

The Supervisory Board is composed of external members Attorney Roberto Zingari and Attorney Gianpiero Zingari, as well as internal member Dr. Jorida Shabanaj.

The Supervisory Board is also tasked with receiving reports regarding any violations or knowledge of breaches of the contents of Model 231.

You can contact the Supervisory Board via the dedicated email address: odv@castelli1938.com

WHISTLEBLOWING

The Company has adopted a process for handling reports (including anonymous ones) concerning the Company, whether submitted by third parties or internal personnel, in compliance with the provisions of the so-called Whistleblowing Decree (Legislative Decree No. 24 of March 10, 2024).

“Whistleblowing” refers to any report concerning conduct attributable to Company personnel that violates laws, regulations, the Code of Ethics, Model 231, or the system of internal rules and procedures in place within the Company.

To submit and manage such reports, the Company has implemented a dedicated digital platform, which serves as the preferred channel for whistleblowing. It can be accessed at the following link: <https://castellispa.wthr.it>

Additional reporting channels include:

- Email to the Supervisory Board: odv@castelli1938.com
- Regular mail marked “confidential and private” sent to the Company’s address: Via Dante Alighieri no. 12, 24060, San Paolo D’Argon (BG), to the attention of the Supervisory Board, in a double sealed envelope;
- Requesting a direct meeting with the Supervisory Board.

Reports relating to personal grievances, disputes, or requests motivated by an individual interest of the whistleblower, as well as commercial complaints, will not be taken into consideration.

The process ensures full protection for the whistleblower and other individuals involved, in accordance with the applicable legislation and the specific whistleblowing procedure attached to Model 231.