

# Global Ethics Code Addendum – Italy

## Introduction and Purpose

This document (“**Addendum**”), together with the Westinghouse Global Ethics Code (collectively, the “**Ethics Code**”), provides an integral, coordinated and unified set of values and principles that Mangiarotti S.p.A. (the “**Company**”), and its related entities, expressly uphold. The Ethics Code is adopted in accordance with the Organization, Management and Control Model pursuant to Legislative Decree No. 231/2001 (the “**Model**”), already implemented by the Company.

The Company has embraced the Westinghouse Global Ethics Code not only as a company part of the Westinghouse group, but also, after careful evaluation, because the values and principles contained therein are in line with applicable Italian legislation and reflect best practices in terms of compliance requirements.

## 1. Nature of the Ethics Code

Compliance with all values and principles provided for in the Ethics Code, is considered by the Company of the utmost importance. Such values and principles are to be considered mandatory for all the employees, contractors, consultants, agents, suppliers and any third party that establishes a business relationship with the Company (the “**Interested Parties**”). No violations of the Ethics Code will be tolerated.

The belief of acting in the interests of or to the advantage of the Company does not justify the behaviors that are not in line with the Ethics Code.

## 2. The Surveillance Committee

In accordance with the provisions of the Model, the Company appointed the Surveillance Committee (*Organismo di Vigilanza – ODV*), which has been granted with autonomous powers of initiative and control aimed at monitoring the functioning of, and compliance with, the Model. The Surveillance Committee is also granted with an appropriate yearly budget that allows the Committee to perform its duties without any outside influence and in complete independence. The powers and the duties of the Surveillance Committee are set forth in article 4.4 of the Model and in the Regulation of the Surveillance Committee attached to the same Model. The Ethics Code also applies to the members of the Surveillance Committee.

### 2.1. Tasks of the Surveillance Committee

The Surveillance Committee acts with impartiality, authority, continuity, professionalism and independence. To this end, it can access all of the Company’s sources of information, review documents and data, carry out audits and conduct interviews with employees.

The main task of the Surveillance Committee is to verify the continuing effectiveness of the Model and all related documents, policies and procedures, which may be called into question by changes either in the legislation or in the company organization. Therefore, on the basis of the information gathered, the Surveillance Committee may suggest updates of the provisions of the Model, the Ethics Code and specific protocols aimed at increasing the effectiveness of the Model and, ultimately, preventing the commission of crimes.

The Surveillance Committee shall also receive and analyze all information and reports concerning any known or suspected violations of the Model or the Ethics Code including allegations of criminal behavior. Once notified of such information and reports, the Surveillance Committee shall conduct procedures to verify the facts of the allegations and, as needed, request and oversee investigations to identify and resolve noncompliance issues and advice on appropriate disciplinary measures. In these cases, the Surveillance Committee might also promote disciplinary proceedings.

All information and reports containing concerning any known or suspected violations of the Model or the Ethics Code should be raised to the Surveillance Committee through the following e-mail address: **odv@mangiarotti.it**. The Surveillance Committee shall ensure the outmost confidentiality in handling all complaints.

The Surveillance Committee is responsible for offering at least two communication channels for such reports in compliance with Article 6 of the Legislative Decree 231/2001, as amended by Article 2 of Law 179/2017. To such end, all Interested parties can also submit information and reports through the Westinghouse Help Chain. The Surveillance Committee of the Company will work with the Westinghouse Global Ethics and Compliance Organization to ensure that all noncompliance issues are addressed in the most effective manner.

### **3. Sanctions**

Any violation of the Model or the Ethics Code constitutes a disciplinary offence. As a consequence, upon the occurrence of any such violation and in order to ensure the effectiveness of the Model and the Ethics Code implementation, the Company shall take all appropriate measures in accordance with article 5 of the Model, which sets forth a complete set of disciplinary sanctions, up to and including the termination of employment.