



CODE OF ETHICS

APPROVED BY THE BOARD OF DIRECTORS ON MAY 15, 2025



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1 INTRODUCTION

This Code of Ethics, approved by the Board of Directors of the Company, is an integral and essential part of the Organisational, Management and Control Model under Legislative Decree no. 231/01 of the Company. It contains the general values of an ethical nature which, together with legal, regulatory and contractual requirements, represent the indications that must be adopted as part of the behavioural principles and control protocols presented in the Special Sections of the Model.

The Company acknowledges that compliance with principles of conduct based on ethical values is of fundamental importance for its own growth at a sports, economic and reputational level.

The Company believes in the importance of the social function of sport in general and, in particular, of football as a tool for training, education, integration and aggregation of individuals. In carrying out its business activities, the company acknowledges and disseminates the values that permeate the regulations promoted by sports institutions such as CONI, F.I.G.C., the Leagues and NADO Italia at a national level, and CIO, FIFA, UEFA and WADA at an international level.

The Company aims to set an example of loyalty, fairness and probity in the football world, and therefore is highly committed to protecting and developing its image and reputation – for example with the promotion and participation in solidarity, training and social integration projects – and requires the same from its own resources.

Aware of the importance that the conduct of footballers, coaches, chaperones, managers and, more generally, all the staff have on its image, the Company requires that all such individuals always maintain an ethically and professionally faultless behaviour. Conversely, it is committed to ensuring full respect for the personality and professionalism of its collaborators and to the valorisation of the same in the organisation and performance of its activities, promoting an environment of mutual respect and rejecting any conduct which is potentially detrimental to the dignity of the individual.

Professional footballers represent the public face of Atalanta B.C. and therefore they too shall collaborate in the diffusion of the values it has embraced. They represent a role model for the new generations, exposed to public opinion and are committed to respecting and disseminating the values embraced by the Company with their exceptional behaviour on and off the soccer field. This means that all statements made – whether during official press interviews or privately through their profiles on the various social networks – must be well thought through and consider the impact they can have on supporters and, in general, on the public as a whole.



The footballers themselves represent a point of reference and inspiration for youngsters approaching the football world and must therefore set themselves as examples of exceptional moral and human dignity.

The Company, being fully aware that the growth of its footballers represents, above all, a fundamental instrument of education and training of the same as well as a precious resource, pays particular attention to the correct management and organisation of the Youth Football section, with particular regard to the respect of the moral and educational obligations by the coaches, the trainers and all the players involved in activities which entail any contact and proximity with young players.

Youth football is organised in such a way as to ensure that the facilities and the staff responsible for the activities, on a competitive and non-competitive level, are suitable for the typical needs of the age of the young players.

In particular, the Company educates young footballers in the values of friendship and mutual respect, as regards to both their teammates and opponents, promoting fair play, which represents a fundamental and essential value that must inspire the competitive activities of all the Company's representatives.

The Company ensures that the competitive activities take place in full accordance with the laws of the game, refusing any behaviour that could potentially alter and modify the normal execution of the match and the regularity of the result, and in any case to reject any type of betting related to the same.

The Company also ensures that appropriate measures are put in place to prevent players, managers and all other members of the club from placing online bets and/or engaging in any kind of gambling such as poker, slot machines, etc.

The Company is actively committed in the fight against doping and against all forms of physical and verbal violence, exploitation, abuse and harassment. The Company is therefore committed to counteracting any form of discrimination based on personal or cultural diversity or based on sex, race, religion, sexual orientation and freedom of thought. Furthermore, all conduct which constitute forms of territorial or ethnic discrimination are strongly condemned.

The Company condemns all forms of violence, on and off the playing field. Footballers, whether amateurs or professionals, must show respect for the opponent and for the rules of the game, avoiding simulations of fouls or provocations against the opponents.

The principle of non-violence and the fight against discriminatory behaviour must also be shared and disseminated in relations with team fans. Therefore players, coaches and managers are obliged to avoid any form of incitement to commit violent and/or aggressive acts and to promote healthy team support without discrimination or offensive behaviour towards opposing players or fans.



For these reasons, the Company is actively engaged in the promotion of events and initiatives against violence and discrimination by organizing activities, interventions and public meetings with professional football players, managers and coaches, aimed at raising awareness among its fans and the general public.

The Company is also active on the territory with initiatives aimed at preventing the abuse of alcohol, drugs and doping drugs, especially in cases where their use is to improve performance in sports.

The Company undertakes to comply with the regulations and provisions issued by CONI, F.I.G.C., Leagues and NADO Italia on a national level, as well as by CIO, FIFA, UEFA and WADA on an international level, and to spread a corporate culture inspired by the principles of fairness and good faith in competitive activities and in relations with third parties. To ensure this, it is essential to build an internal control system that provides for the involvement of all corporate functions in order to ensure compliance with Corporate Rules and procedures.

The Code of Ethics (hereinafter also referred to as the "Code") has been developed in order to turn ethical values into principles of behaviour, which the Recipients of the Code are required to comply with within the scope of their business and activities.

The Code of Ethics contained within this document, characterise the Company's business activity and guide corporate management in providing a set of programmatic guidelines of binding nature.

In line with the guidelines issued by Confindustria, the Company has chosen to adopt a system that, in addition to embracing broader ethical values, incorporates a set of ethical principles specifically designed to meet the requirements of Legislative Decree No. 231/2001 and the FIGC Code of Sports Justice.

The Code of Ethics is structured with an initial section outlining general and fundamental ethical values, followed by a set of ethical principles of conduct related to the specific interests the Company is committed to protecting.



2 RECIPIENTS OF THE CODE ETHICS

The recipients (hereinafter the “Recipients”) of the Company's Code of Ethics are committed to respecting the contents of the same:

- the Company directors and managers (so-called Senior Managers);
- employees and members (so-called persons under the direction or supervision of senior managers);

By virtue of specific acceptance or by virtue of specific contractual clauses, the following external subjects (hereinafter the “Third-Party Recipients”) may be the recipients of specific obligations to comply with the content of the Code of Ethics:

- the footballer sports agents;
- the collaborators, consultants and, more generally, self-employed individuals;
- suppliers and partners (including temporary association of enterprises, temping agencies, including labour supply companies as well as joint ventures);

to the extent where they operate on behalf of or in the interest of the Company within the areas of activity identified as sensitive under the Organisational, Management and Control Model.

Compliance with the principles endorsed by the Code of Ethics is a moral duty of the Recipients in order to pursue the business purpose, according to the fundamental values of integrity, transparency, legality, impartiality and prudence, in full compliance with applicable national and international laws.

In particular, the Recipients are requested to:

- to comply with and abide by the Code of Ethics;
- immediately report any violations of the Code of Ethics to the Supervisory Body, as soon as they become aware of them;
- Request, when necessary, interpretations or clarifications on the ethical principles of behaviours defined below.



3 THE GENERAL AND FUNDAMENTAL ETHICAL VALUES

In achieving its goals, the Company acknowledges the following general and fundamental ethical values, which are binding on all Recipients:

- **Integrity:** all activities shall be managed in a professional and responsible manner, in order to resolve situations where potential conflicts may arise, ensuring that behaviour is characterized by honesty, morality, fairness and integrity and are duly perceived as such. For this reason, for example, footballers are required to maintain irreproachable behaviour, on and off the field, and shall avoid all simulations of fouls or injuries that could mislead the referee or his collaborators.
- **Transparency:** in the Company's internal and external relationships with the various interlocutors, the Recipients are committed to provide clear, complete, timely and truthful information about the Company and its sporting and non-sporting activities is guaranteed from the Recipients. For this reason, for example, even outside the hypotheses in which the federal regulations impose an obligation to report, professional footballers are required to report to the Team Manager any abnormal requests they may receive.
- **Legality:** all conduct, in the decision-making and implementation phase, shall fully comply with all internal procedures, all existing national and international standards as well as the rules and regulations endorsed by the Supervisory Bodies; the behaviour of Recipients must also be inspired by the regulations issued by national and international sports institutions. For this reason, for example, players are required to comply with the rules of the game and with the decisions and measures of the referee.
- **Impartiality:** decisions and behaviours shall be implemented with full respect for the personal characteristics of each individual, encouraging and rewarding integrity and sense of responsibility, respecting diversity and repudiating all possible discrimination on the basis of age, state of health, sex, religion, race, political and cultural opinions, as well as personal or social status. For this reason, footballers shall maintain a responsible, tolerant and respectful conduct with both teammates and opponents on and off the field, regardless of their ethnic or territorial origin.
- **Prudence:** all activities shall be managed with full awareness of the risks involved and with the objective of achieving a sound management of the same; this requires prudent behaviour, especially when any damage to persons and property may result from one's actions and decisions; the Company pays particular attention to the management of the risks relating to the youth sector, based on the training and continuous growth and maturation of young players. For this reason, for example, professional footballers are obliged to avoid any word, gesture or exultation that may, even potentially, constitute a sign of incitement of the fans, either their own or opposing, to the performance of violent or discriminatory acts;
- **Loyalty:** decisions and behaviours shall be implemented taking into account one's duties and commitments, ensuring loyalty to institutions and their representatives



and conforming their conduct to the principles and values that should inspire sports and all related activities. For this reason, for example, professional footballers are called upon to avoid utterances that might be deemed offensive or otherwise detrimental to the dignity and decorum of sports institutions and their individual exponents.

- **Fairness:** decisions and behaviours shall tend toward the achievement of the highest ethical and moral standards, and are implemented in such a way as not to deviate from the rules and customs of the sports system, always maintaining a polite and respectful demeanour of people, institutions and the directions emanating from them. For this reason, for example, footballers are required to strictly adhere to the so-called fair play and, regardless of the position in the standings and the achievement of goals, must still ensure maximum commitment in every match and/or competition.
- **Probity:** activities are managed with honesty, operating according to the logic of moral rectitude and one's own integrity; in particular, decisions and behaviours are not subject to external conditioning and reflect the will and intention of the acting party. For example, for this reason, professional football players contribute with their image to promote initiatives aimed at raising awareness among fans and public opinion and spreading the ethical and moral values that inspire the Company's activities.

Under no circumstances may the pursuit of the Company's interest or advantage justify unethical or dishonest, or illegal, conduct.



4 PRINCIPLES OF ETHICS AND CONDUCT

In achieving its objectives, the Company recognizes as binding on Recipients, the following ethical principles of behaviours subdivided according to the type of interest that Recipients intend to protect.

4.1 PRINCIPLES FOR THE PROTECTION OF THE GAME OF FOOTBALL AND THE SPORTS FEDERATION

The Recipients, each within the scope of their own role and responsibility, must:

- countering the phenomena of violation and non-compliance with the behavioural precepts provided by various bodies operating within the sports federation such as CONI, F.I.G.C., Leagues and NADO Italy on a national level, and CIO, FIFA, UEFA and WADA on an international level;
- promote the management and organization of sporting events, including in relation to the rules of order and safety of sports facilities and spaces adjacent to the same;¹
- ensure and guarantee the proper conduct of the sports event, both with regard to the behaviours of fans and club members, and with regard to the genuineness of the results and physical condition of athletes, professional and non-professional players and sports coaches;²
- counter, prevent and curb the phenomena inherent in the making of bets concerning the results of sports competitions, both football and non-football;³
- counteract and ensure the prevention of the use of doping substances, prolonged use and abuse of drugs and medication that may lead to addiction or generate occupational diseases;⁴
- ensure and promote fair, transparent and cooperative behaviours in dealing with investigative bodies and the sports judicial authority;⁵
- promote the spread of a sports culture based on the values of fair play, loyalty, respect and inclusion, condemning any form of discrimination based on gender, race, ethnicity, religion or sexual orientation;
- promote environmental sustainability in the management of sports activities through the adoption of environmentally sustainable practices in sports facilities and event management;
- ensure social responsibility policies that encourage the participation of young people and local communities in sports activities, encouraging training and education through sports;

¹ The principle under consideration is aimed, among other things, at preventing the unlawful conduct stipulated in the Code of Sports Justice as a prerequisite for direct, strict or presumed liability against sports clubs.

² The principle under consideration is aimed, among other things, at preventing the unlawful conduct stipulated in the Code of Sports Justice as a prerequisite for direct, strict or presumed liability against sports clubs.

³ The principle under consideration is aimed, among other things, at preventing the unlawful conduct stipulated in the Code of Sports Justice as a prerequisite for direct, strict or presumed liability against sports clubs.

⁴ The principle under consideration is aimed, among other things, at preventing the crimes set forth in Article 25-septies of Legislative Decree 231/2001.

⁵ The principle under consideration is aimed, among other things, at preventing the unlawful conduct stipulated in the Code of Sports Justice as a prerequisite for direct, strict or presumed liability against sports clubs.

- counteract all forms of violence, both physical and verbal, in and out of sports facilities by promoting a safe and respectful environment for athletes, coaches, managers, and fans.

4.2 PRINCIPLES TO PROTECT THE INDIVIDUAL

The Recipients, each within the scope of their own role and responsibility, must:

- ensure and promote the protection of people's health and physical integrity as fundamental rights of the individual;⁶
- commit to provide a healthy and safe workplace for its employees, coaches, professional and non-professional football players, health and parasanitary personnel, customers, suppliers, contractors, and anyone present in the offices and sports facilities pertaining to the Company, with special care in the prevention of accidents, occupational diseases, and minimization of risks;⁷
- Seek continuous improvement in safety and health performance by establishing periodically reviewed objectives and targets aimed particularly at preventing occupational injuries and illnesses ;⁸
- commit to comply with current occupational health and safety legislation and regulations, prescriptions and signed voluntary agreements, cooperating with institutions, local authorities and industrial organizations ;⁹
- ensure and promote the protection of individual freedom and human dignity as fundamental rights through which human personality is expressed ;¹⁰
- counter and suppress the occurrence of discriminatory phenomena in sports and work that may give rise to severe anxiety and other stress-related illnesses ;¹¹
- ensure and promote the responsible and respectful development of the individual personalities of young players, contributing to the creation of a team spirit so as to educate the young footballers to learn the rules of common life with mutual respect and autonomy in the management of individual daily activities ;¹²
- reject and commit to combating child labour and exploitation, ensuring adequate educational and psychological support of young players participating in competitions and other sports activities ;¹³
- counteracting the phenomena of undeclared work and irregular immigration, encouraging the integration of only foreign workers with regular residence

⁶ The principle under consideration is aimed, among other things, at preventing the crimes set forth in Article 25-quater.1 of Legislative Decree 231/2001.

⁷ The principle under consideration is aimed, among other things, at preventing the crimes set forth in Article 25-septies of Legislative Decree 231/2001.

⁸ The principle under consideration is aimed, among other things, at preventing the crimes set forth in Article 25-septies of Legislative Decree 231/2001.

⁹ The principle under consideration is aimed, among other things, at preventing the crimes set forth in Article 25-septies of Legislative Decree 231/2001.

¹⁰ The principle under consideration is aimed, among other things, at preventing the crimes set forth in Article 25-quinquies of Legislative Decree No. 231/2001.

¹¹ The principle under consideration is aimed, among other things, at preventing the crimes set forth in Article 25-septies of Legislative Decree 231/2001.

¹² The principle under consideration is aimed, among other things, at preventing the crimes set forth in Article 25-quinquies of Legislative Decree 231/2001.

¹³ The principle under consideration is aimed, among other things, at preventing the crimes set forth in Article 25-quinquies of Legislative Decree 231/2001.

- permits;¹⁴
- reject any form of social discrimination, racism, xenophobia, intolerance and violence;¹⁵
- promote gender equality and ensure equal opportunities for access to sports and professional careers in sports;
- take measures to protect the privacy and protection of personal data of athletes, employees and spectators, ensuring the responsible use of data.

4.3 PRINCIPLES TO PROTECT THE COMMUNITY

The Recipients, each within the scope of their own role and responsibility, must:

- ensure and promote the protection of the environment, as a fundamental asset for the community, through continuous improvement and continuous search for environmentally sustainable modes of operation;¹⁶
- counter the phenomena of illegal immigration by ensuring compliance with the regular administrative process aimed at issuing residence permits;¹⁷
- ensure adequate prevention of the risk of criminal infiltration and promote the adoption of ways of assessing the trustworthiness of various parties (individuals or entities) who have dealings with the Company;¹⁸
- ensure adequate prevention of the risk of criminal infiltration aimed at drug dealing or doping, including through a careful assessment of the reliability of medicines suppliers and those responsible for supplying the Company's pharmacy;¹⁹
- reject and commit to oppose the spread of ideas and the carrying out of actions aimed at spreading terror or subverting the constitutional democratic order²⁰ ;
- promote and ensure the protection of health and safety in the workplace, through the adoption of preventive measures and protocols that minimize risks to workers and users;
- promote respect for economic and tax legality, combating all forms of evasion, avoidance or fraud that may cause harm to the community and public institutions;
- support initiatives and projects aimed at promoting social welfare, culture and education by encouraging active community participation in educational and training initiatives;
- promote the ethics of digital responsibility, countering the spread of fake news, incitement to hatred and misuse of digital technologies, while respecting people's

¹⁴ The principle under consideration is aimed, among other things, at preventing the crimes set forth in Article 25-duodecies of Legislative Decree 231/2001

¹⁵ The principle under consideration is aimed, among other things, at preventing the crimes set forth in Article 25-terdecies of Legislative Decree 231/2001.

¹⁶ The principle under consideration is aimed, among other things, at preventing the crimes set forth in Article 25-undecies of Legislative Decree 231/2001.

¹⁷ The principle under consideration is aimed, among other things, at preventing crimes under L. 146/2006.

¹⁸ The principle under consideration is aimed, among other things, at preventing the crimes set forth in Article 24-ter of Legislative Decree 231/2001.

¹⁹ The principle under consideration is aimed, among other things, at preventing the crimes set forth in Article 24-ter of Legislative Decree 231/2001.

²⁰ The principle under consideration is aimed, among other things, at preventing the crimes set forth in Article 25-ter of Legislative Decree 231/2001.

dignity and rights.

4.4 PRINCIPLES TO PROTECT ECONOMIC RELATIONS

The Recipients, each within the scope of their own role and responsibility, must:

- ensure the adequacy and effectiveness of the administrative-accounting system, which aids in the preparation and disclosure of accurate and complete economic, asset and financial data, aimed at a clear, truthful and fair representation of the facts inherent in the management of the Company and the Group of which it is part;²¹
- promote the establishment and use of appropriate tools to identify, prevent and manage risks related to financial reporting, as well as fraud and misconduct;²²
- promote and ensure compliance with the principles of free competition and fair market performance in the selection of contracting counterparties, negotiation and conclusion of business transactions and contractual arrangements;²³
- promote the exercise of business practices in accordance with the principles of good faith, fairness and loyalty, protecting the trust placed in the Company by contractual counterparties;²⁴
- ensure and promote the necessary confidentiality of regulated information relating to listed issuers to which they may have had legitimate access, as well as the use of such information for only permitted purposes;²⁵
- ensure adequate traceability to financial flows, in full and diligent compliance with regulations to prevent money laundering;²⁶
- ensure appropriate cooperation with the competent authorities in preventing, combating and suppressing the phenomena concerning the counterfeiting and forgery of banknotes, coins and any other means of payment;²⁷
- promote the adoption of ESG (Environmental, Social, Governance) criteria in the management of investments and financial operations;
- ensure transparency and fairness in dealings with investors and stakeholders, avoiding conflicts of interest and deceptive practices;
- promote the establishment and use of appropriate tools to identify, prevent and manage risks related to fraud and misconduct perpetrated through non-cash

²¹ This principle is aimed, among other things, at preventing the crimes set forth in Article 25-ter and 25-quaterdecies of Legislative Decree 231/2001.

²² This principle is aimed, among other things, at preventing the crimes set forth in Article 25-ter and 25-quaterdecies of Legislative Decree 231/2001.

²³ The principle under consideration is aimed, among other things, at preventing the crimes set forth in Article 25-ter of Legislative Decree 231/2001.

²⁴ The principle under consideration is aimed, among other things, at preventing the crimes set forth in Article 25-bis.1 of Legislative Decree 231/2001.

²⁵ The principle under consideration is aimed, among other things, at preventing the crimes set forth in Article 25-sexies of Legislative Decree 231/2001.

²⁶ The principle under consideration is aimed, among other things, at preventing the crimes set forth in Article 25-octies of Legislative Decree 231/2001.

²⁷ The principle under consideration is aimed, among other things, at preventing the crimes set forth in Article 25-bis of Legislative Decree 231/2001.



- payment instruments;
- ensure maximum transparency in communications and information provided to the community, avoiding deceptive or misleading practices.

4.5 PRINCIPLES TO PROTECT CORPORATE ASSETS

The Recipients, each within the scope of their own role and responsibility, must:

- ensure and promote the integrity and safeguarding of data and information by granting individual access privileges to data and information consistent with each individual's role and responsibilities;²⁸
- promote the proper use of intellectual works of a creative nature, as well as computer programs and databases²⁹
- protect tangible and intangible corporate assets, preventing misuse, dispersal or damage that may compromise the value and functionality of the organization's resources;
- avoid conflicts of interest in the use of company resources, ensuring that assets, tools and information are used exclusively for work-related purposes and not for personal or third-party benefits;
- ensure the security and confidentiality of sensitive corporate information, preventing its unauthorized disclosure and taking appropriate measures to counter any cyber threats or unauthorized access;
- prevent and counteract any form of fraud or misappropriation of company assets by promptly reporting any anomalies or misconduct;
- take all necessary measures to ensure the preservation, protection and integrity of cultural property owned by the Company, preventing any form of deterioration, alteration or damage, in accordance with best practices and current regulations;
- adopt sustainable cultural heritage management practices, integrating innovative solutions for the preservation, enhancement and management of assets, ensuring a balance between protection and development.

4.6 PRINCIPLES TO PROTECT THE STATE AND PUBLIC AUTHORITIES

The Recipients, each within the scope of their own role and responsibility, must:

- ensure and promote the protection of democratic values and respect for the State, the Constitution and Public Institutions as fundamental values of our legal system³⁰;
- respect, in every relationship activated, the regularity of administrative procedures

²⁸ The principle under consideration is aimed, among other things, at preventing the crimes set forth in Article 24-bis of Legislative Decree 231/2001.

²⁹ The principle under consideration is aimed, among other things, at preventing the crimes set forth in Article 25-nonies of Legislative Decree 231/2001.



and the smooth operation of the activities of the Public Administration, with formal and substantial respect for the property interests of the same ;³⁰

- ensure and allow, through its own conduct, that activities in which Public Administration involvement is envisaged are carried out in full compliance with the requirements of the law, avoiding any external pressure that could lead to favouritism, discrimination or arbitrary acts in the implementation of the public interest, in such a way as to ensure the fidelity of the Public Administration to the function and purpose assigned to it by law, without deviating or alternating its impartiality ;³¹
- ensure that any use of public grants/funding/tax credits is clear, documented, and that compliance with applicable regulations is ensured;
- ensure and promote fair, transparent and cooperative behaviours in relations with law enforcement agencies and investigating and adjudicating judicial authorities.³²

5 WHISTLEBLOWING

Atalanta S.r.l. promotes the prevention and verification of any unlawful conduct or in any case, contrary to the adopted Code of Ethics by encouraging whistleblowers to promptly report to the Recipients of the report the aforementioned conduct of which they become aware by reason of their relations with the Company.

Atalanta S.r.l. ensures the protection of the whistleblower from any form of retaliation or discrimination through the protection of his or her personal identity and, except in cases of liability for slander or defamation, or for the same title pursuant to Article 2043 of the Civil Code, the person who reports in good faith unlawful conduct or, in any case, conduct contrary to the Code of Ethics, of which he or she has become aware by reason of his or her relations with the Company, may not be sanctioned.

6 THE DISCIPLINARY AND SANCTIONS SYSTEM

Violations of the Code of Ethics are subject to the provisions set forth in the disciplinary and penalty system presented in the General Section of the Organisational, Management and Control Model adopted pursuant to Legislative Decree 231/01 by the Company, regardless of the initiation or outcome of any criminal proceedings.

7 THE ADOPTION AND DISTRIBUTION OF THE CODE ETHICS

The Code of Ethics is adopted by resolution of the Board of Directors of the Company.

³⁰ The principle under consideration is aimed, among other things, at preventing the crimes set forth in Articles 24 and 25 of Legislative Decree 231/2001.

³¹ The principle under consideration is aimed, among other things, at preventing the crimes set forth in Articles 24 and 25 of Legislative Decree 231/2001.

³² The principle under consideration is aimed, among other things, at preventing the crimes set forth in Article 25-decies of Legislative Decree 231/2001 and Law 146/2006.



ORGANIZATIONAL, MANAGEMENT AND CONTROL MODEL ADOPTED
PURSUANT TO LEGISLATIVE DECREE 231/01 - CODE OF ETHICS

Any updates will be adopted by subsequent resolution of the Board of Directors, including, if necessary, at the suggestion of the Supervisory Body, which may become necessary as a result of:

- Significant violations of the requirements of the adopted Model;
- Significant changes in the organizational structure of the Company, or in the way the Company's business activities are carried out;
- regulatory changes, primarily as a result of legislative integration of the *numerus clausus* of predicate offenses.

It is the responsibility of the Board of Directors to ensure that the principles contained within the Code of Ethics are communicated to and understood and adhered to by all Recipients.

Recipients are required to read and ensure full understanding of the contents of the Code of Ethics. In particular, the Company's directors and managers are responsible for creating a culture that is grounded in the principles contained within the Code of Ethics, promoting awareness of and encouraging commitment to them.

Aware of the moral importance of this Code of Ethics, Atalanta S.r.l. intends to make its values and guiding principles public and accessible to all. To this end, the Code of Ethics can be consulted on the Company's official website: <http://www.atalanta.it/site.html> .