Ethical Code

"FIGURES ARE IMPORTANT BUT VALUES ARE WHAT MATTER MOST"

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FOREWORD

The aim of this document is to be the main reference tool for the promotion, dissemination and management of work and business ethics within the company. The Ethical Code of Marvon S.r.l. was created as part of the company's path of social responsibility and the growing attention to the principles for a correct and efficient company management. The introduction of ethics in corporate processes is considered strategic for the development of quality and business competitiveness.

The Ethical Code defines the set of values, principles, and lines of conduct that Marvon recognises, accepts, and shares in the conduct of its business activities and that must inspire all stakeholders in their work. The ethical principles set out in the Code must guide both collective and individual behaviour, in compliance with the laws and moral values. The goal of the Ethical Code is to promote unambiguous guidelines of conduct to improve corporate efficiency in internal and external relationships (customers, agents, suppliers, institutions, collaborators), enhancing their operation and reputation with consequent benefits, including economic ones.

1.1. What is the Ethical Code

The Ethical Code is an official document concerning Corporate Social Responsibility for the promotion of good conduct practices. The adoption of ethical values and principles is an essential element of the preventive control system, promoting and developing good behaviour. The Ethical Code contains the set of rights, duties, and responsibilities of the Company towards its stakeholders.

The Code supplements the laws or contractual rules and requires compliance with the applicable regulations. Each stakeholder must commit to comply with the laws and regulations in force in all the countries in which Marvon operates.

The Ethical Code is a document sought and approved by the top management of the Company and then circulated from the top down to the entire corporate organisation. The behaviour of the people that make up the organisation conveys the company's image to the outside world: there is therefore a direct relationship between compliance with the rules, authoritativeness, reliability, and success of the company.

The Ethical Code also helps all collaborators to behave in accordance with correct ethical principles, setting reference standards and rules of conduct that must characterise the decision-making processes of the Company and guide its behaviour.

VISION, MISSION AND ETHICAL VALUES

The guidelines that Marvon intends to follow in order to achieve its strategic objectives.

2.1. Vision

Marvon's vision is to become its partners' primary reference point, from the initial concept to the finished product, and to become a model of sustainable industrial efficiency within the alliance of values shared with its customers and suppliers.

2.2. Mission

Marvon's mission is to be an industrial excellence in the creation of customised products conceived and developed alongside its partners. Deeply rooted in its territory and with a strong international vocation, Marvon has implemented sustainable processes that are respectful of both people and the environment.

2.3. Values

Passion: our land teaches and conveys a passion for work, which gives us the energy and motivation to meet the challenges posed by the market.
Work: tenacity, dedication, and pragmatism are the qualities that distinguish our work ethics and have ensured our business continuity over time.
People: team spirit and opportunities for growth generate a sense of belonging and commitment. Everyone's contribution is important.
Reliability: clarity, honesty, and transparency are the guidelines upon which our external relations are based.
Innovation: the continuous improvement of our products and processes allows us to promptly respond to the market's demands.
Environmental sustainability: we continuously invest in waste reduction, energy efficiency, renewable energy, and resource recovery.
Dynamism: our daily operations require flexibility, speed, versatility, and the ability to use change as an opportunity.

ADDRESSEES

The addressees of the Code are all those who, in various capacities and with different responsibilities, participate in the achievement of the objectives of Marvon S.r.l. (hereinafter also referred to as Marvon or the Company) through trust, regardless of the relationship that connects them. They are required to know its content and to contribute to its implementation and improvement. Any conduct that does not comply with the principles set out herein is a breach of the pact of trust and must therefore be reported to the Ethical Committee.
Marvon requires all stakeholders acting within the company to maintain a conduct in line with the general principles of this Code, also disseminating its content to those with whom they come into contact.

GENERAL PRINCIPLES AND ORIENTATIONS

4.1. Respect

Marvon commits itself to comply with all national and international laws and directives and generally accepted practices; it also bases its decisions and conduct on this Code.
At the heart of Marvon's values is respect for the individual, and this results in the commitment to establish a relationship of trust with all stakeholders, working loyally and effectively to achieve the corporate objectives with the awareness of one's tasks and responsibilities.
Marvon also believes that the respect for the territory and the community in which it is located is essential, paying particular attention to the well-being of future generations.

4.2. Confidentiality

Marvon ensures the confidentiality of the information in its possession, except in cases of express and informed authorisation in compliance with current regulations, and guarantees that personal data is processed with the utmost respect for the dignity of the data subject. The information acquired from employees and collaborators belongs to Marvon and cannot be used, communicated, or disseminated for purposes not related to the performance of its activities.

4.3. Transparency and truthfulness

For Marvon, transparency means adopting management tools to create a dialogue with the purpose of responding to expectations for knowledge of the economic, social, and environmental impacts of corporate activities, so that each stakeholder can make informed decisions.
Towards the external stakeholders, the Company strives to achieve and maintain the best international certifications and to implement social and environmental reporting initiatives, with the aim of providing information on the actions carried out at all corporate levels in an accurate, complete and understandable manner.
All actions, operations, transactions and, in general, the conduct of employees and collaborators regarding the activities carried out in the performance of their duties and responsibilities must be based on truthfulness, transparency, and honesty.

4.4. Honesty

Honesty is the fundamental principle for all the activities carried out by Marvon and is an essential value in organisational management. Relationships with stakeholders must be based on fairness, cooperation, loyalty, and mutual respect; the pursuit of the Company's interests does not justify any action that does not comply with the values set out in this document.
Marvon and its collaborators are committed to constantly complying with the laws, this Code and the company regulations that are consistent with it.

4.5. Trust and fair competition

Marvon promotes the creation of a climate of trust in internal and external relationships between the parties. When conducting business on the market, situations in which the persons involved are or may appear to be in conflict of interest with Marvon, or any case in which a collaborator pursues an interest other than the corporate mission or takes personal advantage from corporate business opportunities, must be avoided.
Marvon intends to protect the value of fair competition in full compliance with the relevant regulations of the countries in which it operates by refraining from collusive and predatory behaviour and abuse of a dominant position.

4.6. Impartiality and equal opportunities

Marvon avoids any discrimination based on age, gender, health, race, nationality, political opinions, and religious beliefs of its stakeholders.
Marvon bases its relationships with its collaborators on the principle of fairness, committing itself to enhancing their experience and developing their skills, also promoting cooperation and exchange of knowledge.
Workers are valued based on their merit, rewarding behaviour consistent with the principles and ethical values expressed in this document.
In keeping with this principle, Marvon embraces the value of pay transparency as a cornerstone of a fair and inclusive workplace. The Company is committed to promoting equal pay between women and men for equal work or work of equal value, adopting employee classification and economic and professional progression policies based on objective, meritocratic, and strictly gender-neutral criteria.

4.7. Importance of communication and collaboration

Marvon recognises the value of communication among all those involved in the company's activities as an essential factor for sharing and exchanging skills and increasing the sense of belonging to the Company. This value is also pursued in respect of the external stakeholders, with whom a relationship aimed at dialogue and mutual listening is established.
Marvon recognises the fundamental value of collaboration between human resources and the various company structures and is committed to encouraging the development of team spirit based on the attention to customer needs and the interests of the company.

4.8. Focus on quality

Marvon, with the commitment and involvement of all its staff, bases its activities on high quality standards, constantly monitoring the performance indicators of its processes in order to ensure the required level of standards by pursuing a policy of continuous improvement.
Marvon believes that the contribution of each collaborator in his/her individuality and as part of a team is an essential element for the development of the Company and the enhancement of people. For this reason, contracts and assignments imply the commitment of collaborators to the best performance of work processes and their improvement, using all the skills available and through participation in training programmes developed for all levels, aiming at promoting the growth of professionalism.

4.9. Employment protection

Marvon undertakes not to use, even indirectly, forced and compulsory labour or child labour and rejects any form of discrimination in its hiring policies and human resource management. Marvon undertakes to prevent any form of harassment (e.g., mobbing, bossing, and straining), intimidation, physical or moral violence, and exploitation of labour, whether direct or indirect, and to recognise the essential criteria for remuneration and career development in terms of work performance and professional potential.

4.10. Protection of health and safety

Marvon believes that the development of an active prevention culture, undertaken in accordance with the current legislation on prevention and protection and through the ongoing search for well-being in the workplace, can help to reduce accidents. Marvon guarantees working conditions that respect the dignity of the individual and the improvement of workstations and operating spaces in the departments is a particularly important aspect in terms of health and safety.
Marvon also encourages its collaborators to participate in the process of risk prevention and protection of health and safety with the aim of increasing their awareness of the importance of reporting information to prevent any risks.

4.11. Protection of environment and sustainable development

Marvon, being aware that its production activity has an environmental impact, plans the development of its activities by valorising natural resources with constant attention to preserving the environment, and is inspired by the utmost respect for the environment inside and outside its facilities, to protect all stakeholders.
Marvon contributes to the spreading and raising of awareness on the subject of sustainable development among all its collaborators and manages its activities in an environmentally compatible manner, taking into account the rights of future generations. The environmental policy is implemented starting from simple behaviours up to the continuous improvement of technologies and production practices, in order to achieve compliance with the regulations in force in the various national states in which the Company operates and to adopt the best technological solutions.

RELATIONSHIPS WITH EMPLOYEES & COLLABORATORS

Human resources are an essential element for the Company's development and success. The professionalism and commitment of employees are key values for the achievement of Marvon's objectives which, therefore, rewards the skills and results achieved by each employee, when the rules are accepted and respected.
For this reason, the Company protects and promotes the value of people in order to improve and increase the assets and competitiveness of the skills of each employee.

5.1. Protection of the individual and physical and moral integrity

The Group is committed to ensuring compliance with the conditions required for the existence of a collaborative and non-hostile work environment and to preventing any form of discrimination, whether related to physical condition, disability, opinions, nationality, religion, sex, sexual orientation and gender identity, or any other condition that may give rise to discrimination. Differences which can be justified on the basis of objective criteria do not constitute discrimination.
If discriminatory acts should occur, the collaborators must notify their Manager and the Human Resources Manager.
Marvon promotes diversity, inclusion, and equal opportunities and is committed to creating a working environment in which people are treated fairly, guaranteeing the right to decent working conditions marked by human solidarity, thereby striving to protect the physical and moral integrity of the Company's workforce.
Marvon requires to contribute personally to maintaining a work environment respectful of other people's sensitivities, in an atmosphere of mutual respect for the dignity, honour, decorum and reputation of others, with a commitment to intervene to prevent insulting, discriminatory or defamatory attitudes.
Marvon requires from all collaborators a commitment to respect people's fundamental rights, and local customs, cultures and religions, always reflecting the dignity of their role in line with the Group's ethical principles. Marvon also requires a commitment that in internal and external work relations, no one should be placed in a state of subjection by means of violence, threats, deception, abuse of authority, abuse of a situation of physical or mental inferiority, or of a situation of necessity; Marvon disapproves of any harassing behaviour, including that of a sexual nature.
Marvon prohibits any behaviour that can be considered as moral violence and/or psychological persecution aimed at offending the personality, dignity and psychophysical integrity of the person, as well as endangering his/her employment or degrading the work environment (mobbing and/or straining).
Without prejudice to the privacy of its employees and collaborators, the Company is committed to finding ways to pay attention to their needs, especially in difficult situations that may prevent the normal performance of work.
In order to develop risk awareness and promote responsible behaviour, Marvon is committed to spreading and consolidating a safety culture among its employees and collaborators by adopting health management systems and defining specific objectives and improvement programmes aimed at minimising accidents and occupational diseases.

5.2. Staff recruitment and selection

Staff selection is carried out by checking that the applicants' profiles fully correspond to the professional profiles required by the Company, pursuing a policy of awareness in terms of equal opportunities for all the persons involved. Staff is asked to provide information that is exclusively used to verify professional and working requirements, with due respect for its privacy.
The staff recruitment takes place on the basis of regular employment contracts.
When the employment relationship is entered into, each employee receives accurate information on:

- characteristics of the function and role to be performed;
- regulations and remuneration;
- content of the Company Regulations;
- content of the Ethical Code.

The above information is provided to the employee/collaborator to ensure its actual understanding.
Specifically, Marvon ensures that personnel selection procedures are conducted in compliance with the prohibition on requesting information from candidates regarding their current salary or salary received from previous employment relationships. Each candidate has the right to receive clear and transparent information regarding the starting salary or salary range for the role, based on objective and neutral requirements.

5.3. Training

Marvon, through constant and specific training activities, is committed to developing the skills and expertise of each employee in order to allow him/ her to realise his/her full potential, combining the Company's growth needs with the training needs expressed and providing the appropriate tools for professional refresher and development.

5.4. Engagement of employees and collaborators

Marvon, starting from its managers, promotes a work environment based on the information and engagement of its employees, in particular by:

- clearly defining the corporate roles and duties;
- encouraging contribution to innovation and problem solving through "improvement ideas" and department meetings;
- organising periodic meetings to share corporate objectives between area managers and their collaborators;
- developing suitable corporate communication tools;
- periodically conducting surveys on the corporate climate and working to improve it constantly.

5.5. Corporate assets and resources

Each collaborator is required to work diligently and efficiently to protect and enhance corporate assets and ensure that their use is consistent with the interests of the Company. Employees and collaborators must take care of corporate assets, whether tangible or intangible, protecting them and preventing their fraudulent use or misuse for their own benefit or that of third parties.
The use of corporate resources by employees must be limited to Marvon's needs according to the role assigned to them; personal use is possible only in previously agreed cases.

5.6. Use of IT systems

Each collaborator is responsible for the security of the IT systems used and is subject to the legal provisions in force, as well as the conditions of the license agreements. Workers may use the services of the IT infrastructure (e-mails, Internet, etc.) in compliance with the corporate policy in order not to compromise its functionality and protection, avoiding the behaviours set out below:

- sending contradictory and ambiguous e-mail messages;
- using insulting or offensive language;
- engaging in inappropriate behaviour that may cause offence to a person and/or damage the Company's image;

- surfing websites with improper and/or offensive content;
- posting or interacting with social content unrelated to the Company.

All collaborators are required to make every effort to prevent the possibility of committing offences when using IT tools and to comply with the social media policy.

All employees are required to use artificial intelligence and algorithmic processing tools in their professional practice responsibly and ethically, and in strict compliance with internal security policies and applicable data protection and copyright regulations. Entering personal, sensitive, or trade secret data of Marvon or third parties into external, unauthorized generative artificial intelligence platforms is expressly prohibited. Any decisions or content generated through artificial intelligence systems must always be verified and validated by a human operator, who retains full responsibility for them.

5.7. Confidentiality and information management

Marvon guarantees the protection of personal data of each of its collaborators; the acquisition, processing and storage of personal information takes place according to specific procedures to ensure full compliance with the regulations on privacy protection.

Collaborators are required to keep confidential the information they obtained in the course of their duties in accordance with the requirements of the privacy regulations in force. This obligation of confidentiality must be observed even after the termination of the employment relationship. Depending on his/her level of responsibility, each collaborator is required to protect the integrity, confidentiality, and access to the Company's documents for which he/she is responsible.

5.8. Protection of corporate image and reputation

Each Marvon collaborator, in the performance of his/her duties, must pursue and protect the values set out in this Ethical Code, guided by a conduct characterised by moral integrity, transparency, honesty, and good faith, and taking into account the evolution of the social context, technology, and new tools available.

Marvon believes that respect for the values that have always characterised its business spirit is extremely important and, being aware that the use of Social Media has become an important tool of global communication, considers necessary that all collaborators comply with the Social Media Policy, respecting the basic rules of conduct to be observed when using and publishing content and comments online.

5.9. Conflict of interest

Employees and collaborators are required to avoid situations in which conflicts of interest may arise and to refrain from taking personal advantage of the position, information, and discretion of which they have become aware in the performance of their duties.

All employees and collaborators are obliged to report any potential situations of conflict of interest in which they may be involved to their direct superiors, even in the event of involvement of independent third parties such as consultants, agents, suppliers, distributors, and collaborators in general.

5.10. Gifts, presents and other benefits

Marvon avoids giving and receiving gifts that could be interpreted as exceeding normal courtesy practices. Moreover, employees cannot offer gifts or other benefits to any person from which they may receive preferential treatment in the conduct of any activity related to the Company.

5.11. Respect for corporate choices

Each collaborator is required to respect the principles set out in this Code and, without prejudice to the freedom of opinion with respect to the choices made by the Company, the conduct of employees and collaborators must safeguard Marvon's reputation.

STAKEHOLDER RELATIONS

6.1. Customer relations

The relation between Marvon and its customers, i.e. anyone who uses the products or services of the Company in any way, is characterised on the one hand by availability, respect, participation, and transparent behaviour to increasingly consolidate the relationship of trust, and by confidentiality, professionalism, and quality services to protect the customer's interests, on the other.
In providing its services, Marvon guarantees fair treatment among customers, both actual and potential.
Recognising the value of listening and dialogue, Marvon establishes and promotes tools and channels aimed at ensuring that customers receive timely and quality information and communication, in order to increase the level of mutual collaboration and thus improve the quality of the relationship. Marvon's goal is to satisfy and protect its customers by ensuring fairness in contracts and business relations and by listening to the requests that can help improve the quality of products and services.

6.2. Supplier relations

Suppliers are people and companies that, in several respects, individually or as part of a chain, provide goods, services and resources necessary to carry out the activities and provide the services, helping to build the corporate image and reputation and contributing to the achievement of the objectives. All of them are required to adopt the goals and principles of this Code; therefore, the quality of the relationship with the Company also depends on their ethical behaviour. Marvon's conduct towards its suppliers is based on the search for quality, cost-effectiveness, sustainability, and the recognition of equal opportunities.
Marvon is committed to developing relations with suppliers based on communication and the mutual exchange of skills and information in order to facilitate the creation of shared value. The declaration of acknowledgment of this Code by the suppliers is a prerequisite for entering into a contract. Suppliers undertake to provide information on their social and environmental policies and their outcomes in relation to the assignments received. Marvon, on its part, makes sure that the requirements of these companies correspond to those required by the corporate procedures and qualification systems to the extent provided for in the contract.

6.3. Consultant relations

When the services of a consultant are required, Marvon undertakes to select the profile most suitable for the corporate needs which, for his/her professional expertise, is able to provide the required services in the best possible way. The consultant's services must be provided in a transparent way, so that the Company can verify the services actually provided. The consultant is also bound by a confidentiality obligation in order to protect the corporate know-how shared in various ways.
The indications and advice provided by the consultant must always be in compliance with the corporate objectives and policies, as well as the content of the Ethical Code. Services must be paid on the basis of a detailed report of the activities carried out and the remuneration must be agreed in advance and detailed in a contract.

6.4. Agent relations

Marvon is committed to maintaining a relation of fairness and collaboration with its business partners, aimed at pursuing mutual satisfaction, within the scope of their respective economic interests.
The selection and management of business partners are carried out according to specific procedures based on objective elements and equal opportunities.
Relations can only be established with partners inspired by ethical principles similar to those set out in this Code, in particular to the values and limitations contained in this document.

6.5. Market and competitor relations

Competitors are considered the main incentive for continuous improvement of performance, and the positive challenge of competition is faced with the principles of loyalty, legality, and fairness.
Marvon refrains from any conduct that may be detrimental to the market or that may represent an abuse of position.
Employees, in their communication and correspondence with competitors, must ensure that they do not share or disclose any information from which conclusions could be drawn about the current or future market behaviour by Marvon or other competitors.
Marvon is motivated by a strong and fair competitive spirit, in the belief that fair competition improves the functioning of the market for the end customer.

6.6. Relations with institutions and public administrations

Marvon is committed to collaborating with Public Administration bodies and with Public Institutions in general, by providing the national and local authorities responsible for the control and regulation of the services with all the information requested in a clear, complete, correct, and timely manner.
In full compliance with the law, Marvon develops relations of collaboration and communication with the institutions concerning:

- regulatory and administrative operations relating to corporate activities;
- environmental protection;
- risk prevention.

In protecting their interests, directors, employees, and collaborators act with integrity towards national and international Public Institutions, with transparent and respectful behaviour towards their public counterpart. Marvon is committed to making tax payments to the competent Authorities in accordance with the law, and to providing tax returns that are true and do not contain false, deceptive, or incomplete data.
Marvon provides its expertise and is committed to cooperating with institutions and representatives to have regulations aimed at territorial well-being, while ensuring the sustainability of the businesses managed.
When dealing with the Public Administration, the following actions must not be (directly or indirectly) taken:

- proposing employment and/or business opportunities and seeking or establishing personal relations to obtain favours, influence, interference with the aim of influencing, directly or indirectly, the activities of the Public Administration;
- offering or providing in any way money or other benefits to the public official involved, his/her family members or any person associated with him/her;
- soliciting confidential information that may compromise the integrity or reputation of both parties;
- receiving favours, gifts or other benefits from representatives of the Public Administration at any level.

6.7. Relations with the territory and the communities

Marvon pursues its objectives while respecting and protecting the environment. For this purpose, it is committed to adopting certified environmental management systems, which aim at continuous improvement of performance according to international standards in order to work for the prevention of environmental risks.
The Company, following the evolution of environmental regulations, defines specific improvement programmes aimed at minimising environmental impacts and at sustainable industrial development, also promoting in-house environmental awareness and training activities, and encouraging the spread of eco-efficient technologies.
Marvon, being aware that respect for the environment is a competitive advantage in an increasingly sensitive and demanding market, is committed to paying attention to the life of the community in which it operates and to listening to the community's requests through a constructive dialogue aimed at collaboration with the citizens, supporting the development of their positive behaviour.
The Company shows its attention to the territory, in particular the communities located near its - current and future - facilities, by implementing information, listening and involvement initiatives aimed at supporting the quality of life through social activities with ethical value compatible with the Company's values. Marvon also organises information, educational, and tutorial initiatives concerning respect for the environment and efficient management of resources according to the principles of the circular economy.
When supporting social and cultural initiatives and sponsorships in general, Marvon only considers initiatives that are consistent with its strategic objectives and the principles of environmental and social responsibility and gives preference to initiatives that offer a guarantee of quality, distinguished by the ethical message they convey.
Marvon is committed to reporting every two years the results of its commitment to all stakeholders through the publication of the sustainability report, which should contain, *inter alia*, the environmental and social impact of its activities using internationally recognised indicators.

6.8. Gifts, presents and benefits

Marvon avoids any behaviour that may be interpreted as a promise or offer of payments, goods, or other benefits of any kind that may be interpreted as exceeding normal business courtesy practices, in order to promote and favour its own interests and taking advantage of them. Gifts and acts of courtesy are permitted only if of modest value or in any case such as not to compromise the Company's reputation.
Employees may not accept gifts or other benefits whose nature may be perceived as a way of influencing the impartiality and integrity of their decisions or interpreted as a way to receive unjustified favours.
Marvon does not provide contributions of any kind to political parties and refrains from any form of pressure on public representatives; illegal amounts of money and bribes are prohibited under all circumstances, regardless of the amount.
Gifts and benefits offered that are not in line with ethical principles must be reported to the relevant Manager and to the Ethical Committee, to allow an adequate assessment and, if necessary, return or donate them to charity in accordance with the relevant specific corporate regulations.

IMPLEMENTATION OF THE CODE

7.1. Adoption and validity of the Ethical Code

This Ethical Code was adopted on 21/06/2019 with immediate effect.
Any update to this Ethical Code must be approved in advance by the General Management; any changes are a guarantee of its effectiveness and its compliance with changes and developments in the context from which it is inspired.

7.2. Adoption and monitoring of the Ethical Code

The application of and compliance with the Code are monitored by the Ethical Committee, which must also assess the effectiveness of management and internal control tools with regard to the implementation of the principles of the Code, in accordance with the CSR body.
Any breach of this Code may be reported to the Committee, which undertakes to ensure the secrecy of the reporter's identity, without prejudice to legal obligations.
The Committee analyses and assesses the reports of non-compliance and the adoption of any sanctioning measures inspired, where there is no fraudulent behaviour or behaviour in breach of specific legal, contractual or regulatory provisions, by a constructive approach that consolidates the sensitivity and attention of individuals to the respect of the values and principles stated in the Ethical Code, without prejudice to the possibility that criminal proceedings may be carried out in the cases where an offence occurs.

7.3. Breach of the Code and sanction system

Compliance with the provisions of the Ethical Code must be considered a substantial part of the contractual obligations with Marvon. Breach and non-application, even partial, of the Code amounts to breach of contract and results in an ethical disciplinary offence, with the consequent adoption of proportionate measures in relation to the seriousness or recidivism or the degree of conduct that, in compliance with the contractual provisions, may result in a claim for the damages suffered, both material and to the Company's image.
The breach of all or part of the Ethical Code by the stakeholders will be a sufficient reason for the termination of the collaboration with Marvon, in compliance with the contract and the law.

7.4. Promotion of the content of the Code

Marvon is committed to disseminating and promoting knowledge, understanding, and implementation of the Code at all levels of the organisation by offering training, information and awareness initiatives to employees and collaborators on the purposes and contents of the Code, after checking its consistency with the Company's rules.
These actions will be coordinated by the CSR manager, who can use internal and external expertise to carry out his/her tasks and also undertakes to draw up an annual report on the application of the Code by Marvon and to report periodically on his/her activities and the results of the Company's commitment to all stakeholders.

7.5. Stakeholder reporting

All stakeholders must promptly report any breaches, violations, or suspected violations of the Code according to the whistleblowing procedures adopted by Marvon, pursuant to Legislative Decree no. 24/2023.

In accordance with Legislative Decree 24/2023, ANAC Guidelines no. 1/2025, and the most recent case law, Marvon guarantees maximum protection for those who report violations of the Code of Ethics or unlawful conduct of which they are aware, ensuring confidential, secure, and independent communication channels.

Any form of retaliation, discrimination, or penalization, whether direct, indirect, or implemented through detrimental organizational changes, to the detriment of the whistleblower and similar individuals, is strictly prohibited and sanctioned. In addition to nullifying any retaliatory act, the Company is committed to preserving the moral, reputational, and professional integrity of the whistleblower, protecting them from any form of harm and recognizing the centrality of whistleblowing as an essential tool for compliance and transparency.