

## CAME WHISTLEBLOWING MANAGEMENT PROCEDURE

### 1. AIM AND SCOPE OF APPLICATION

This Whistleblowing Management Procedure (hereinafter also “**Procedure**”) regulates the process of receiving, evaluating and managing the reports related to potential illicit or irregular conducts by persons related in various capacities to CAME S.p.A. (hereinafter also “**CAME**”) or any other subsidiary or related company or company belonging to the same group (hereinafter also the “**Company(ies)**”). Its aim is to ensure the right application of the current legislation.

More specifically, the Procedure describes how CAME’s or Companies’ staff (administrators, employees, business partners etc.) or other third parties (clients, providers, advisors etc.) could report illicit or irregular conducts related in various capacities to CAME or the Companies (hereinafter also “**Report(s)**”). Moreover, it defines how CAME and the Companies have to manage such Reports.

The Procedure applies to all the Reports sent, even if anonymously, to CAME and/or to all the Companies that have decided to adopt it.

The Companies shall notify the Board of Directors of CAME of the date of adoption of this Procedure.

### 2. LAW OF REFERENCE

- Legislative Decree No. 231/2001 (“*Regulation of administrative liability of legal entities, companies and associations, including those not having personality, in accordance with Article 11 of the Italian Law of 29 September 2020, No. 300*”), with special reference to Article 6 as amended by Law No. 179/2017 (“*Regulations on the protection of the parties reporting offences or irregularities they have become aware of in the context of a public or private work relationship (also known as whistleblower or whistleblowing)*”). It arranges that the Organisational, Management and Control Models adopted by the Companies according to this law provide for the following:
  - a. One or more channels allowing Model 231 recipient (directors and subordinates) to disclose detailed Reports concerning illicit conducts based on precise and consistent facts they have become aware of thanks to their working position. These channels shall guarantee confidentiality on the reporting party’s identity;
  - b. At least one alternative reporting channel by the use of IT tools that guarantees the confidentiality on the reporting party’s identity;
  - c. the prohibition of any form of direct or indirect retaliation or discrimination towards the reporting party as a result of the Report;
  - d. sanctions against those who violate the measures protecting the reporting party, besides those who send Reports turning out to be unfounded for bad faith or gross negligence.

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In addition, the regulation establishes the invalidity of retaliatory and discriminatory dismissals, the change of duties and any other retaliatory measure against the reporting party pursuant to Article 2103 of the Italian Civil Code.

- Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of the Union law;
- Legislative Decree No. 196/2003, “Privacy Code” and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

In any case, the provisions of this Procedure cannot derogate from the law, the Community legislation directly applicable in the Italian State, the Ethic Code and the Organisational, Management and Control Model pursuant to Legislative Decree No. 231/01 (hereinafter “**Model 231**”).

### **3. TERMS AND DEFINITIONS**

For the purposes of this Procedure:

**Reporting Channel:** CAME sets up specific tools by means of which the reporting party can send a Report:

- Whistleblowing Platform: it is the preferential channel since it guarantees the confidentiality on the Whistleblower’s identity. The reporting party can log into this Portal directly using the following link: <https://came.integrityline.com/>
- E-mail to: [whistleblowing@came.com](mailto:whistleblowing@came.com)
- Ordinary mail to the Whistleblowing Committee’s address: via Martiri della Libertà, 15, 31030, Dosson di Casier (TV), Italy.

It is, however, still possible to transmit Reports by any useful means to the Reporting Committee.

**Ethic Code:** the Ethic Code adopted by CAME and Companies.

**Whistleblowing Committee:** it is a cross-functional and collegial body consisting of the Heads of CAME’s HR and IT and the members of CAME’s Supervisory Body. It is responsible for the management of Whistleblowing Reports. Its Internal Regulation governs its operations and it can be considered as an integral part of this Procedure.

For the purposes of this Procedure, the Whistleblowing Committee is responsible for the management of the process of analysis of the Report in all its phases: receiving, registration, preliminary verification and investigation, as specified in paragraph 5. Moreover, it is responsible for the drafting of reporting documents for the evaluation of the Report and for

digital or paper storage of the documents related to its own activities, besides all the obligations provided by the law in force and by this Procedure.

**Whistleblowing File:** a digital or paper collection of documentation concerning the operations and the activities carried out during the whole reporting process. The Whistleblowing File is accessible only to Authorised Persons.

**Corporate Units Concerned:** CAME and the Companies' corporate units concerned by the Report, who receive suggestions by the Whistleblowing Committee about monitoring actions aimed to prevent potential offences and/or irregularities. Only if strictly necessary to manage the Report, the Corporate Units Concerned shall collaborate with the Whistleblowing Committee in assessment activities on the validity of the facts reported, always respecting the principles of confidentiality on protection of both the reporting and the reported party.

**CAME:** for the purposes of this Procedure, it means CAME S.p.A.

**Urgent Notice:** during the Preliminary Verification, the Whistleblowing Committee shall send an urgent notice to the Board of Directors, the Board of Advisors and the Supervisory Board of CAME (or of any other concerned company) where the Report is related to facts of such relevance and seriousness that can potentially damage CAME or any other concerned Company in terms of assets or not, or that make it necessary to notify the Judicial Authority.

**Model 231:** Organisational, Management and Control Model pursuant to Legislative Decree No. 231/01 adopted by CAME and the Companies.

**Supervisory Body:** the body appointed by the Board of Directors according to Legislative Decree No. 231/01 and responsible of monitoring the implementation and application of Model 231.

**Personnel:** any administrator, executive, manager, employee, collaborator, intern or similar of CAME or of any other Company.

Within the scope of this Procedure, the Personnel reports Potential Relevant Offences to the Whistleblowing Committee through the channels provided, ensuring the utmost respect of confidentiality on the Whistleblower's and of Reported Party's identity. The Personnel is prohibited from communicating the data related to the Report to third parties (specially the identities of the parties of the Report), unless otherwise required by law.

**Whistleblowing Platform:** preferential reporting channel guaranteeing, by the use of IT tools, the confidentiality on both the Whistleblower's and the Reported Party's identity. It allows the management of the report pursuant to current legislation. Thanks to the Whistleblowing Platform, the Whistleblower can send the Reports, even anonymously, and get to know the results after the conclusion of assessments and evaluations.

**Potential Relevant Offence:** the subject of the Report ascribed to the Reported Party by the Whistleblower and related to alleged violations or irregularities carried out by the Reported Party.

**Final Report:** a document drafted by the Whistleblowing Committee and concerning the results of the Preliminary Verification and the Investigation, where the Report turns out to be well founded.

**Whistleblower:** employees, partners, administrators, providers, clients and any other third parties reporting illicit or irregular conducts performed by a subject operating on behalf of CAME or any other Company (not only employees and administrators, but also collaborators, business partners, advisors, interns etc.).

**Reported Party:** the potential author of the illicit or irregular conduct identified in the Report. It could be a person, an identified or identifiable Corporate Unit, and related to CAME, or to any other Company. The Personnel, the members of corporate or control bodies, the auditing firm collaborators and any other third party can assume the status of Reported Party.

**Report:** any communication sent, even anonymously, to CAME or to any other Company through the channels provided for in this Procedure. The Report concerns a conduct involving the Personnel or other persons related to CAME, or to any other Company, and it is carried out in violation of laws, regulations, Authorities' measures, policies and internal corporate procedures, Model 231 and Ethic Code.

**Anonymous Report:** a Report where the Whistleblower's general details are not specified and therefore he/she cannot be identified.

**Verifiable Detailed Report:** a sufficiently detailed Report (describing circumstantial facts providing information about time, place and modalities of the violation, identifying the persons involved) that concretely allows Authorized Persons to carry out the assessment activities in order to verify the validity of the Report.

**Good Faith Report:** a Report based on facts the Reporting Party knows and on a reasonable belief that the illicit or irregular conduct has been taken place in the modalities, times and according to the circumstances reported. The Report shall be deemed in good faith even if the assessment activities verify that the illicit or irregular conduct did not occur.

**Unfounded Report for Bad Faith:** a Report based on untrue events (never happened/ committed by different persons/ in completely different ways) and submitted by whom has the only purpose of damaging or causing prejudice to the Reported Party. This Report represents a violation of Model 231 and Ethic Code and remains so even if the assessment activities verify that the offence actually occurred (for example if it was committed by a different person).

**Unfounded Report for Gross Negligence:** although there is no case of Unfounded Report for Bad Faith, a Report submitted with gross negligence, imprudence or malpractice by whom has no sufficient elements to consider with reasonable belief that an illicit or irregular conduct has occurred.

**Report 231:** a Report concerning Potential Relevant Offences in violation of Model 231 and Ethic Code or related to the perpetration or the attempt of one or more crimes under Legislative Decree No. 231/2001.

**Company:** a subsidiary, a related company or a company belonging to the same group of the companies related to CAME.

**Authorised Persons:** authorised persons could be the Whistleblowing Committee, the Supervisory Body, the control and management bodies, the Judicial Authority and the Corporate Units Concerned, depending on the circumstances and the needs related to the specific event.

**Whistleblowing:** the process by which the Whistleblower submits the Reports on Potential Relevant Offences.

## **1. GENERAL PRINCIPLES**

### **3.1. Protection of the Right to privacy**

In managing the Report, personal data are processed in compliance with the Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR), besides the legislation in force, whether Italian or a potential secondary regulation issued by the Authority for personal data protection.

All activities related to the management of Reports are carried out ensuring the utmost confidentiality on the Whistleblower's and the Reported Party's identity and applying the main principles of the legislation in force related to personal data processing: lawfulness, necessity and proportionality. To this purpose, the management reporting system regulated by this Procedure provides for methods and limits in processing and communicating personal data, in order to protect the Reported Party's honour and reputation as well as to guarantee a suitable protection of the Whistleblowers.

CAME and the Companies guarantee the confidentiality and anonymity of the Whistleblowers and the Reported Parties within the scope of this Procedure and subject to compliance with legal obligations. Only Authorised Persons can process data.

Therefore, anyone who is appointed to process a Report or receives one - even accidentally - and therefore comes into information related to it, is prohibited from revealing such information. The above shall be without prejudice to information duties provided by this Procedure and within the limits of legal obligations. The above-mentioned prohibition aims to guarantee the utmost confidentiality on the following:

- the Whistleblower's and the Reported Party's identity;
- Elements of the Report;
- in any case, all information reported,

and to apply the regulations provided for by this Procedure for the management of the Reports.

All the data acquired during the processing of the Report shall be saved on suitable digital and/or paper supports for 10 years, in order to guarantee their traceability and accessibility only by Authorised Persons.

The privacy information notice under Art. 13 and 14 of the Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR) is available at the company's website in the section dedicated to Whistleblowing.

### **3.2. Whistleblower's protection**

Whistleblowers who have sent a Good Faith Report are guaranteed protection against any retaliatory and/or discriminatory action or conduct, which is directly or indirectly aimed to cause a wrongful damage due to the Report (e.g. harassment in the workplace, mobbing). Therefore, any measure taken against the Whistleblower that can be considered unlawful because retaliatory and discriminatory as the result of the Report (e.g. dismissal, demotion) must be considered invalid. Who consciously takes the decision for the above-mentioned reasons can be considered accountable and subjected to disciplinary responsibility, without prejudice to any kind of responsibility provided for by the legislation in force, which could may arise from such conduct.

### **3.3. Limits to the Whistleblower's protection**

In relation to Good Faith Reports, the Whistleblower's identity shall be revealed only if this necessity arises because of a legal obligation, for example, if requested by the judicial authorities. In all these cases the disclosure of the Whistleblower's identity and/or other information related to the Report shall be limited to what is strictly necessary in compliance with legal obligations and directed only to the persons to whom the information is owe (for example, judicial bodies, public prosecutor, attorneys, etc.).

The Whistleblower's protection could fail due to Unfounded Report for Bad Faith or it could weaken in the case of Unfounded Report for Gross Negligence. CAME and the Companies have defined protection mechanisms from the above-mentioned Reports, in order to guarantee the respect of everybody's dignity, reputation and honour and to prevent defamatory and slanderous behaviours. They have provided for the application of the disciplinary system as required from Model 231 informing, when necessary, the Reported Party in order for him/her to take appropriate legal action to defend his/her own rights. In any case, the Whistleblower can be considered criminally liable due to an Unfounded Report for Bad Faith, as well as civilly liable due to both Unfounded Reports for Bad Faith and Gross Negligence.

### **3.4. Reported Party's protection**

In order to protect the respect of dignity, reputation and honour of the Reported Parties, besides all the persons who are involved in the Unfounded Reports for Bad Faith and Gross Negligence, who could be subjected to a violation of their own rights further to the Report, CAME and the Companies ensure the following:

- the annulment of the provisions taken against them, as a result of the Report, should it turned out to be unfounded, besides the adoption of all the measures aimed to obtain the reinstatement of the ex-ante situation;



- the adoption of disciplinary sanctions against the Whistleblower.

The Whistleblowing Committee can reveal the Whistleblower's identity to the Reported Party:

- in case of Unfounded Report for Bad Faith, where the Reported Party shows the necessity of protecting his/her own rights and taking appropriate legal action towards the Whistleblower (for example, by filing a complaint or an action for damages);
- in case of Unfounded Reports for Gross Negligence subject to explicit and motivated request by the Reported Party, demonstrating that, despite the above-mentioned measures, he/she has suffered additional damages and wants to obtain a relief in the judicial court. The reveal of the Whistleblower's identity must be considered necessary to protect the Reported Party.

### **3.5. Independence and impartiality of the Whistleblowing Committee**

The Whistleblowing Committee carries out its activity in compliance with the principles of independence and impartiality towards the persons involved in the Report. The Whistleblowing Committee has to inform exclusively the Board of Directors of CAME about its activity, and, in the cases provided for and unless otherwise provided for legal obligations, CAME's and the Companies' control bodies (Board of Statutory Auditors and Supervisory Body).

### **3.6. Rules for the coordination between the Whistleblowing Committee and the Supervisory Body**

In relation to Report 231, the Whistleblowing Committee ensures a prompt exchange of information with the Supervisory Body of CAME or any Company concerned in the Report.

Likewise, in the scope of this Procedure, each Supervisory Body receiving a Report of Relevant Potential Offence shall promptly inform the Whistleblowing Committee, without prejudice to legal obligations and the tasks entrusted to the Supervisory Body.

## **4. WHISTLEBLOWING MANAGEMENT PROCEDURE**

### **4.1. Receiving the Report**

The Whistleblower sends the Report, even anonymously, by means of one of the channels provided for by this Procedure.

If the Whistleblower is identified or identifiable, he/she shall receive a notice that the Report has been taken over.

Only Whistleblower Committee's members have access to the above-mentioned Reporting Channels. In case the Personnel receives Reports, even accidentally, they shall transmit them to the Whistleblower Committee and are prohibited to communicate the data related

to the Report to any third parties, especially with reference to the Whistleblower's and Reported Party's identity, without prejudice to legal obligations.

#### **4.2. Content of the Report**

The Whistleblower shall provide all the suitable elements aimed to recreate and specify time and place of the facts detailed in the Report and to identify the responsible person(s).

The Reports shall contain the following essential elements:

- the Whistleblower's personal information, in the absence of which an anonymous Report would be transmitted; and the Reported Party's personal information or elements that allow his/her identification;
- a clear, precise and true description of the facts reported and, if known, the circumstances relating to the time and place where the facts have taken place;
- the information about any other potential individuals involved or informed on the facts and who could report useful information regarding the facts reported;
- any documents or any other information useful to verify the validity of the facts reported.

In any case, all Reports shall be subject to Registration and Preliminary verification by the Whistleblowing Committee, in accordance with the following paragraphs of this Procedure, even if they do not meet the above-mentioned requirements.

#### **4.3. Registration and taking charge of the Report**

As soon as the Whistleblowing Committee receives the Report, it shall register it in the designated Whistleblowing File on a digital and/or paper support and it shall separate the Whistleblower's and the Reported Party's personal data from the content of the Report. This process aims to handle the Report anonymously and to reconnect the identities to the content of the Report only if necessary and at a later stage of the Procedure.

#### **4.4. Preliminary Verification**

Normally within 30 days the Whistleblowing Committee carries out a first Preliminary Verification of the Report basing on the information reported at its outcome:

- a. where the Report is not manifestly unfounded and corresponds to a Verifiable Detailed Report:
  - the Committee begins the Investigation;
  - in case of Report 231, it informs the Supervisory Body promptly;
  - where the facts reported are of such gravity and relevance that can cause a property and/or not property damage to the Company concerned or to CAME or can require notice to the Judicial Authorities, the Whistleblowing Committee drafts and transmits a Urgent Notice to the Board of Directors, the Board of Statutory Auditors and the Supervisory Body. These latter, at their discretion, can give the Whistleblowing Committee non-binding recommendations on the management of the Report;



- b. where the Report is manifestly unfounded or not sufficiently so specific and detailed as not to make possible the development of Investigation, the Whistleblowing Committee rules for a dismissal of the Report. The same occurs even if it has already been the subject of previous Preliminary Investigation and consequent dismissal and there is no need to carry out new verifications;
- c. where there is suspicion of Unfounded Reports for Bad Faith or for Gross Negligence, the Whistleblowing Committee begins the Investigation in order to verify the subsistence of the Whistleblower's bad faith or gross negligence.

#### **4.5. Investigation**

The Whistleblowing Committee carries out all the verification, analytical and evaluation activities necessary to establish the following:

- in regard to Verifiable Detailed Reports, the validity of the facts reported;
- regarding alleged Unfounded Report for Bad Faith or Gross Negligence, the subsistence of the Whistleblower's bad faith or gross negligence.

Where necessary, the Whistleblowing Committee also ensures to:

- conduct further investigation and examination among the Corporate Units Concerned, also availing itself of external experts and advisors;
- gather information from the individuals involved in the facts reported by means of a confidential hearing in respect of confidentiality on the Whistleblower's and Reported Party's identity;
- archive all the documentation proving the activity carried out in the Whistleblowing File.

The Personnel collaborates at the request of the Whistleblowing Committee without the need of requesting authorization to their manager or superior. Except for the Reports for Bad Faith or Gross Negligence, the Personnel is guaranteed the same protection as the Reported Party against retaliatory and/or discriminatory acts and conducts put in place by reason of the collaboration provided.

All the individuals involved in the Investigation are required to preserve the highest level of confidentiality on data and information related to the Report. They are also subject to an absolute prohibition of disclosing the identity of the Whistleblower and the Reported Party, without prejudice to legal obligations.

#### **4.6. Final Evaluation**

At the end of the Investigation:

- a. where the Report results founded, the Whistleblowing Committee:
  - sends the Board of Directors and possibly the Supervisory Body of CAME or the concerned Company the Final Report including the results of the activities carried out during the Preliminary Verification and the Investigation. In the

Final Report the Whistleblower Committee explains the reasons justifying the validity of the facts reported and the responsibilities identified, as well as the potential need to follow up with appropriate charges to the Judicial Authorities. In case the Reported Party is a member of the Board of Directors, the Final Report shall be sent to the Board of Statutory Auditors and only to the members of the Board of Directors who are not concerned;

- suggests the Board of Directors of CAME or the concerned Company disciplinary and/or corrective actions to be taken in order to remove the damaging effects resulting from the offence and to avoid a repetition of such behaviours;
  - archives in the Whistleblowing File all the documentation proving the activity carried out;
  - communicates the result of the Whistleblowing Managing Procedure to the Whistleblower.
- b. Where the Report results unfounded, the Whistleblowing Committee:
- dismisses the Report and archives all the documentation proving the activity carried out in the Whistleblowing File;
  - communicates the result of the Whistleblowing Managing Procedure to the Whistleblower.
- c. Where the Report results not sufficiently specific and detailed but still not such that its validity cannot be excluded:
- suggests the Corporate Units Concerned the development of monitoring activities aimed to avoid the taking place of the facts reported subject to the prohibition to disclose the Whistleblower's and the Reported Party's identity, and without prejudice to legal obligations;
  - archives in the Whistleblowing File all the documentation proving the activity carried out;
  - communicates the result of the Whistleblowing Managing Procedure to the Whistleblower.
- d. Where the Report results Unfounded for Bad Faith, the Whistleblowing Committee:
- sends the Board of Directors and the Supervisory Body of CAME or of the concerned Company the documentation proving the Whistleblower's liability with the related proposal on disciplinary measures to be applied;
  - where necessary, suggests the Board of Directors the adoption of measures for the protection of the Reported Party;
  - archives in the Whistleblowing File all the documentation proving the activity carried out;
  - communicates the result of the Whistleblowing Managing Procedure to the Whistleblower.

- e. Where the Report results Unfounded for Gross Negligence:
  - if the Report has caused significant damage to the Reported Party and/or to CAME or to the concerned Company, it sends the Board of Directors of CAME or of the concerned Company the documentation and the related proposal on disciplinary measures;
  - archives in the Whistleblowing File all the documentation proving the activity carried out;
  - communicates the result of the Whistleblowing Managing Procedure to the Whistleblower.

### **5.5. Management of Reports against members of the Whistleblowing Committee and/or the Board of Directors**

If the Report is related to a Potential Relevant Offence carried out by a member of:

- the Whistleblowing Committee: the Report shall be sent promptly to the Board of Directors of CAME or the concerned Company, which shall deal with its management according to this Procedure and with the support of the other members of the Whistleblowing Committee not involved in the Report. The failure to transmit the Report to the Board of Directors constitutes a grave breach of duty for the members of the Whistleblowing Committee and therefore a potential ground for dismissal from office;
- the Board of Directors: the Report shall be sent promptly to the Board of Statutory Auditors of CAME or the concerned Company and to the directors not involved. Only if the Report turns out to be unfounded following the verification activities, the reported director will be informed about it. The failure to transmit the Report to the Board of Directors constitutes a grave breach of duty for the members of the Whistleblowing Committee and therefore a potential ground for dismissal from office.

## **6. DISCIPLINARY SYSTEM**

The disciplinary procedure is carried out aside from any criminal proceeding or the perpetration of a crime, since, for the purposes of this Procedure, all conducts representing a violation of internal and corporate procedures and policies are relevant, even if they are not criminal or civil offences.

The disciplinary system shall be applied against all the individuals, who, after the verification activities, turn out to be responsible for the irregular or illicit conduct or against those who:

- put in place retaliatory and/or discriminatory acts as a consequence of the Report, violating the measures for the protection of the Whistleblower;
- send Unfounded Reports for Bad Faith or Gross Negligence, where they have caused a wrongful damage to the Reported Party and/or to CAME or to the Companies.

The definition and the application of the sanction shall be carried out in respect of the contractual regulations and the legislation in force as well as the principle of proportionality of the sanction.

## **7. REPORTING**

Biannually the Whistleblowing Committee drafts and sends:

- the Board of Directors, the Board of Statutory Auditors and the Supervisory Body of CAME a summary report about the Reports received during the half-year of reference including a general and anonymous account, in respect of the principle of confidentiality and guaranteeing the anonymity of the Whistleblower and the Reported Party;
- each Companies a detailed report on the Reports received including an account of their managing activities. The Companies receive only the Reports related to the single Companies to which the Report is directed.

## **8. ARCHIVING OF DOCUMENTATION AND TRACEABILITY**

All the documentation submitted and collected during the managing process of the Report shall be archived in the Whistleblowing File on a digital and/or paper support. The archiving of the documentation aims to reconstruct the entire process of the management of the Report and to guarantee its traceability, in respect of confidentiality and data protection of the Whistleblower and the Reported Party.

Access to the Whistleblowing File is limited only to Authorised Persons.

## **9. DISTRIBUTION AND TRAINING**

This Procedure shall be distributed as widely as possible using different channels of communication in order to inform all the potential Whistleblowers about the management methods of the Reports.

For this purpose this Procedure is:

- approved by the Board of the Directors of CAME and the Companies that decide to adopt it;
- sent to the Board of Statutory Auditors and the Supervisory Body of CAME and the Companies that decide to adopt it;
- delivered to each new hire at the time of recruitment with the relevant acknowledgment of the document;
- published on the corporate website and intranet available at the following link <https://www.came.com/it/responsabilita-sociale>;
- affixed to the spaces dedicated to corporate communications.

The Board of Directors of CAME shall approve possibly future updates to the Procedure and the updated document shall then be published again.



This Procedure shall also be the subject of specific training for the employees of CAME and the other Companies that decide to adopt it.