

# GLOBAL ETHICS CODE ADDENDUM - ITALY

## INTRODUCTION AND PURPOSE

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

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

## 1. NATURE OF THE ETHICS CODE

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

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

## 2. THE SURVEILLANCE COMMITTEE

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

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

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

**3. WHISTLEBLOWING**

Any person who, in the context of his/her work or professional relationship with the Company, acquired information about possible violations can report to the Westinghouse Global Ethics and Compliance Organization, on an anonymously or non-anonymously basis, by using any of the internal channels:

1.	Westinghouse Ethics and Concerns Helpline Web Platform	Through the online reporting system available at the following link: <a href="http://www.WECCConcerns.com">www.WECCConcerns.com</a> .
2.	Westinghouse Ethics and Concerns Help Line phone	By dialling the following numbers available 24/7/365:  Fase 1: 800-172-444  Fase 2: upon request, digit 8442384380
3.	Physical meeting	Upon request of the Whistleblower to be submitted through the above internal channels, by means of a direct meeting scheduled within a reasonable timeframe.

In addition to the above, all information and reports containing concerning any known or suspected violations of the Model or the Ethics Code may be raised also to the Surveillance Committee though the following e-mail address: **mangiarotti.odv@westinghouse.com** or via post to the following address: Mangiarotti S.p.A., via Timavo 59, Monfalcone (34074 - GO), attention to the Chairman of the Surveillance Committee.

The Surveillance Committee and the Westinghouse Global Ethics and Compliance Organization regularly communicate and cooperate in order to assure that any possible violation are investigated and solved in the most efficient way, adequately preserving the confidentiality and protecting the reporter. In all cases, the Company actively undertakes to ensure that the reporters who will be using the indicated reporting channels are protected against any form of retaliation or discrimination in compliance with the provisions of Legislative Decree No. 24/2023 and Legislative Decree No. 231/2001.

For additional details and information please visit the Ethics & Compliance pages on “George” or you can consult the Model or the Ethics And Concerns Reporting And Investigations Policy (BMS-LGL-92) and the relevant Whistleblowing Addendum for Italy.

#### **4. SANCTIONS**

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