

# CODE OF ETHICS

of



### List of Revisions Code of Ethics

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## **1 INTRODUCTION**

*“The Code of Ethics is the “Charter of Values of the company”.*

*It summarises the principles of behaviour that administrators, directors, managers, employees and business partners of any nature, and the suppliers of You Energy Volley S.S.D.R.L. (hereinafter the “Company”) have to comply with when running the business, doing the work, managing the internal and external relations of the company, therefore setting out the set of rights, duties and responsibilities of the Intended Users of the Code.*

*This Code of Ethics (hereinafter the “Code”) forms an integral part of the “Organisation, Management and Control Model” provided for under article 6 of Legislative Decree 231/2001 with respect to the administrative liability of entities and legal persons. It also fulfils the provisions provided for under the Sporting Code of Conduct of CONI (Italian National Olympic Committee).*

*By preparing adequate tools of information, prevention and control, the Company guarantees the transparency of the behaviour carried out, intervening, where necessary, to suppress any breaches of the Code, supervising compliance with it.*

*This document was approved by the Company’s bodies, which undertake to ensure the broadest disclosure to all the Intended Users and to the public in general, including through publication on the website ([www.gassalespiacenza.it](http://www.gassalespiacenza.it)).*

## **2 GENERAL ETHICAL PRINCIPLES**

### **2.1 RANGE OF APPLICATION AND INTENDED USERS OF THE CODE**

The set of ethical principles, values and rules of behaviour set out under this Code must inspire the activities of anyone who operates, inside or outside, the sphere of action of the Company, including the members of the company bodies, the managers, the employees, the business partners, the players, the consultants and the commercial partners, and any other outside partner of any nature and external parties who operate in the name of and/or on behalf of the Company.

The “Intended Users” are all those to whom the provisions of this Code apply, and more specifically:

- a) the Sole Director, the Chairperson, the Deputy Chairperson, the Managers and anyone else in a top manager position, with those referring to any person who holds representation, administration or management roles, or exercises, including on a de facto basis, the management of the Company, regardless of where they operate from, either in Italy or abroad (the “Company Representatives”);
- b) all the employees of the Company, including temporary workers or part-time workers and similar types of workers;
- c) all those who, directly or indirectly, on a full-time or temporary basis, have relations with the Company, or in any case, operate in the pursuit of its objectives;
- d) the external consultants and in general the natural persons who hold or who would like to hold commercial relations with the Company on their own behalf or on behalf of the legal persons they represent;
- e) the athletes, sporting staff, including support staff, and the medical staff and members in general;
- f) more generally, all those who, in any capacity, operate within the scope of the areas at risk on behalf of and/or in the interests of the Company.

The Code is made available to all the Intended Users, who will have to comply with its provisions both in relations between themselves (known as internal relations), and in relations with third parties (known as external relations), to actively contribute to its implementation and to report any shortcomings to the applicable reference department.

### **2.2 COMPLIANCE WITH PREVAILING LAW AND REGULATIONS**

The Intended Users, in the performance of their duties, will have to comply with

prevailing laws, the applicable sports rules and regulations and this Code. The Intended Users must not find themselves, when performing the various activities, in any situation that could create a real and/or potential conflict of interest with the Company. "Conflict of interest" situations refer to those in which an interest is pursued that is different to the interests of the Company and/or that gives a personal advantage.

No behaviour that is contrary to the above-mentioned rules and regulations and this Code, even if motivated by the pursuit of an interest of the Company, may be considered justified, and will involve the adoption of sanctioning provisions by the Company.

### **2.3 TRANSPARENCY**

The Sole Director, Employees and Business Partners of the Company undertake to provide complete, correct, adequate and timely information both to the outside (for example to the Public Authorities) and internally. The information will be given in a clear, simple form, and generally provided in writing.

### **2.4 INTEGRITY**

In the relations with the Intended Users, and with third parties in general, the Company undertakes to act with integrity and transparently, and not provide misleading information or behave in a way that would draw undeserved advantages from positions of disadvantage of third parties.

### **2.5 CONFIDENTIALITY**

The Company guarantees the confidentiality of the information in its possession, and will not gather or use sensitive data unless it is given express, informed authorisation by the owner of the data, and in any case, in accordance with prevailing legal regulations. The Sole Director, employees or business partners may not use confidential information for reasons that are not connected with the performance of their jobs.

### **2.6 LEGALITY**

Within the scope of their professional activities, the Sole Director, employees and business partners of the Company will have to diligently comply with prevailing laws, the Code of Ethics and internal regulations and measures.

The Intended Users of the Code of Ethics undertake to encourage maximum proactive vigilance in order to prevent and promptly report any behaviour that would affect sportsmanship, any unlawful activity or any risk of criminal infiltration into the sporting world.

The Company rejects all forms of corruption or bribery or attempts at corruption or bribery, and imposes the maximum prohibition on the exploitation or boasting of relations with representatives of the Federal Bodies or parties engaged by them.

## **2.7 COMPETITION**

The Company bases its activities on compliance with the rules of fair competition, which it believes to be a basic, essential value for the development of the company structure and for the requirements of the public.

All sporting activities and the behaviour of the individual members should revolve around that principle of fair competition in the management of relations between themselves and the various members of national and international volleyball organisations.

## **2.8 COMPANY REPUTATION**

The Company considers its image and reputation to be values that have to be protected and developed, including through the full promotion, agreement and compliance with ethical, loyalty and sportsmanship principles.

Therefore, the Intended Users must not behave in a way, either in public or in private, that would adversely affect the reputation of the Company, and endeavour to ensure respect for it to the best of their ability.

## **2.9 RESPONSIBILITY, FAIRNESS, HONESTY**

People who operate in the name of and on behalf of the Company must carry out their sports activities and work with fairness, honesty, diligence and loyalty with respect to the other Intended Users and third parties, which must include customers, suppliers, public authorities, private parties, opponents and fans. They must use the tools and time available as well as possible, and they must take on the responsibilities associated with their duties.

The Company also condemns any actions or behaviour aimed at fraudulently obtaining registration with a sports competition, or giving an athlete membership in breach of or evading federal rules and prevailing laws.

## **2.10 RESPECT FOR THE PERSON**

People are key resources of the Company: respect, opportunities for growth and development and the recognition of personal merits represent the guiding principles.

Requests, accompanied by threats, violence, favours or promises aimed at persuading the Sole Director, employees or business partners to act against the law and the Code of Ethics are not tolerated and will actually be punished.

## **2.11 IMPARTIALITY AND NON-DISCRIMINATION**

The Company rejects, opposes and punishes any behaviour, including only apparently discriminatory, that relates to nationality, health status, age, sex,



religion, religious, political, moral or philosophical orientation or sexual preferences or habits of its stakeholders.

In the performance of their respective professional duties, the Intended Users will have to comply with the criteria of impartiality, and only favour or facilitate persons or solutions on the basis and in consideration of verifiable technical-professional assessments.

## **2.12 FAIR PLAY**

The Company recognises the principles of fair play in the performance of sports activities as fundamental. The Intended Users of the Code of Ethics undertake to ensure strict compliance with Olympic values in the performance of competitions in addition to preparatory and organisational events leading up to competitions.

These values incorporate the concepts of friendship, respect for others and sportsmanship and include the fight against any practices that would distort or hollow out the rules, doping, violence (both physical and verbal), sexual abuse or harassment, racial discrimination, exploitation, inequality in opportunities for young people, corruption or bribery and the distortive commercialisation of sporting values.

### **2.12.1 PRINCIPLES OF LOYAL COOPERATION**

The Intended Users of the Code of Ethics undertake to encourage, with loyal cooperation with respect to public institutions, at all territorial levels, and with sports institutions, and especially with respect to FIPAV, the effective and efficient application of laws, directives, regulations or orders issued by said Institutions in all legal-economic matters relating to the sport and volleyball in particular. They will also undertake to fully abide by the decisions of the sports justice bodies without reservations or protests, subject to legitimate appeals.

### **2.12.2 PRINCIPLES OF SPORTSMANSHIP**

The Intended Users of the Code of Ethics undertake to behave, both in competitive relationships and administrative relationships, with maximum mutual sportsmanship, complying with all standard practices of fair play in sports.

They therefore undertake to refuse and report any doping practices or sports betting, even if channelled through official operators, as factors that, including hypothetically only, could help falsify the results of sports events. In accordance with this purpose, the Intended Users may not take part in competitions or make sports bets that relate to volleyball games, nor may they accept gifts, presents, benefits or pressure that could influence the free achievement of the sporting results expressed on the court.

### **2.12.3 PRINCIPLES OF SOCIAL RESPONSIBILITY**

In the awareness of the social and cultural function of sport, the Intended Users of the Code of Ethics undertake to behave responsibly with respect to the sporting community as a whole, with special attention to the world of the supporting spectators.

#### **2.12.4 PRINCIPLE OF PROTECTION OF THE PERSON**

The Intended Users of the Code of Ethics undertake, in the performance of competitions in addition to preparatory and organisational events leading up to competitions, to respect the physical, moral and cultural integrity of people on a strictly diligent and responsible basis.

#### **2.13 VALUE OF THE CODE**

Breach of the aforesaid rules by the Intended Users will constitute a breach of the obligations under the work contract or business partnership relationship, and will be subject to all legal and contractual consequences.

The Company undertakes to provide for and impose, with consistency, impartiality, and uniformity, disciplinary sanctions in proportion to the breaches of the Code and in compliance with prevailing legislative provisions regarding governance of employment relationships.

#### **2.14 REFERENCE BODY FOR APPLICATION OF THE CODE**

The Code Guarantor is the reference body for application of the Code, and has the duty to examine reports of possible breaches and organise the preliminary investigations and most advisable inspections, and to propose the imposition of the resulting sanctions to the applicable body. The Guarantor is also a point of reference for the interpretation of relevant aspects of the Code.

### **3 RULES OF BEHAVIOUR**

#### **3.1 RELATIONS WITH EMPLOYEES, BUSINESS PARTNERS AND MEMBERS**

The Company recognises the centrality of the human resources as a main factor of success in any economic or sporting activity, in a framework of loyalty and mutual trust between representatives of the Company, employees, members and business partners.

The selection, training, management and development of employees and non-employees (business partners, professionals, etc.) is carried out without any discrimination, in accordance with the criteria of merit, skills and professional competence.

Athletes are hired in accordance with federal rules and regulations and the prevailing collective agreements.

The acquisition and assessment of the members is carried out by taking account, in addition to the above, the investment policies and number of engagements expected by the Company for each sports season, when establishing the budget.

#### **3.2 ORGANISATIONAL FAIR PLAY**

The Company undertakes to implement the FIPAV policies aimed at preparing adequate sporting-organisational structures, placing all the figures provided for under prevailing laws into its workforce, including specialised medical staff, the people in charge of the facilities and safety at the workplace and the places where training is carried out and games are played (gyms, sports stadiums, etc.) and the sports manager, limiting the accumulation of duties held by them to the maximum extent possible in order to ensure the full operation and efficiency of each function.

#### **3.3 HEALTH, SAFETY AT WORK AND ENVIRONMENT**

The Company works to safeguard, through preventive actions, the health and safety of employees, members and business partners, and guarantees working conditions that respect individual dignity and safe and healthy workplaces, in full compliance with prevailing laws with respect to environmental protection and the prevention of accidents at work and the protection of the workers.

Within the scope of its company activities and relations with third parties, it undertakes to adopt responsible behaviour to safeguard the environment, acting with scrupulous compliance with applicable laws in relation to environmental protection and the limits defined by any authorisations and requirements received from the applicable Entities.

##### **3.3.1 POLICIES FOR THE SAFETY OF SPORTS EVENTS**

The Company also undertakes, within the limits of its authority and responsibilities, to ensure the safety of anyone who uses its sports entertainment services.

The Company shall comply with policies for the safety of sports events, pursued by CONI (Italian Olympic Committee), the FIPAV, the FIPV, and the general legal system, and promote and adopt all measures and procedures it is responsible for, dedicating adequate staff and resources for the purpose.

More specifically, the Company undertakes to dedicate resources and staff for the safety policy in the stadiums/palaspports/gyms and the sensitive surrounding areas, during sports events, diligently adopting the general safety measures provided for by the national Observatory on sporting events and all further special and occasional measures provided for events particularly at risk, by the applicable government authorities.

### **3.4 RELATIONS WITH THE FEDERAL BODIES**

The relations with the sports institutions and authorities (including but not limited to FIPAV, FIPV, Serie A National Volleyball League, CONI (Italian Olympic Committee), and with the representatives of said authorities (employees, people in charge, representatives, referees, judges) shall be held exclusively by parties engaged by the Company in accordance with applicable state and sporting laws.

Subject to exercise of the right of defence and review, within the limits and forms permitted, of the decisions of judging bodies, the Intended Users must not attempt to influence the decisions of said bodies in any way, especially where they carry out jurisdictional activities. Relations must always be based on transparency and honesty, and on the principles set out under this Code of Ethics.

The Intended Users must cooperate, if requested, with the sporting authorities and institutions in order to facilitate their activities. More specifically, they have the duty to appear before the Sports Judging bodies and check and submit all documents that may be requested. The Intended Users also have the duty to inform the sports institutions of any unlawful situations that they are aware of.

### **3.5 RELATIONS WITH THE PUBLIC AUTHORITIES OR PUBLIC SERVANTS**

The Intended Users must not attempt to unduly influence in any way decisions of the Public Authorities or public servants. The Intended Users must also not attempt to obtain confidential information from the Public Authorities that could undermine the proper operation of the Company and the Public Authorities.

The Intended Users must also refrain from exploiting or boasting about relations with respect to representatives of the Public Authorities.

The Intended Users must not offer money or gifts to managers, officials or employees of the Public Authorities or their relatives, either in Italy or abroad, unless they involve low-value

presents or gifts in kind that just represent common courtesy.

The Intended Users must not accept any item, service, performance or favour to obtain more favourable treatment in relation to any relations held with the Public Authorities.

If the Intended Users use the services of a third party to be represented in relations with the Public Authorities, the Intended Users must endeavour to ensure that said third party undertakes to ensure its work complies with the principles described under this Code.

### **3.6 GIFTS, PRESENTS AND OTHER BENEFITS**

No forms of gifts are allowed that could even be interpreted as exceeding normal business practices or common courtesy, or in any case aimed at obtaining preferential treatment in the performance of any activity that could be connected to the Company.

The Company will be particularly sensitive in its dealings with the various members of the FIPAV and requires the Intended Users, with special regard to the members, to behave in accordance with the provisions of this Code and ensure maximum compliance with federal regulations and prevailing laws.

#### **3.6.1 CONFLICTS OF INTEREST**

The Intended Users are obliged to avoid and prevent any situation that could cause conflicts of interest, either actual or potential and/or apparent, between company or personal activities and/or related parties, and refrain from taking part in the making or any decision or carrying out any activity that could cause those situations, even when one's participation could only generate a lack of trust in the impartiality and independence of the Company.

The Intended Users who find themselves in a situation of actual or potential conflict of interest must refer it to the Company and/or the Guarantor of the Code.

#### **3.6.2 PROPER USE OF THE COMPANY ASSETS**

Each Intended User is responsible for the protection and proper use of the goods owned or provided to the Company (including but not limited to apartments, cars, equipment), material and non-material assets, including confidential information and computer and network resources, and has the duty to promptly inform the designated units of any threats or events that could harm the Company.

More specifically, each Intended User must:

- work with diligence to protect the Company's assets through responsible behaviour and in keeping with the operating procedures established to govern their use;
- avoid improper use of the Company's assets for purposes that are contrary to the law, public order or public morality, or commit or incite the commission of criminal offences and/or in any case racial intolerance, the incitement to violence or the breach of human rights.

### **3.6.3 ABUSE OF ALCOHOL OR DRUGS AND BAN ON SMOKING**

All the Company's personnel shall personally contribute to promoting and maintaining a climate of mutual respect in the workplace, with special attention to respect for the feelings of others. It is therefore expressly prohibited to hold, consume, offer or give, for whatever reason, alcohol, drugs or substances with similar effect during working activities and in the workplace, or to smoke at the places of work.

### **3.6.4 MANAGEMENT**

The sports managers must all carry out their activities in a way that ensures maximum professionalism and operational capacity, and follow the principles of integrity, honesty and morality, giving up the sports offices if they incur criminal sanctions. Additionally, they must not incur sports-related sanctions for situations connected to the participation in betting on sports events.

The lack of pending criminal charges and possession of the subjective requirements, either direct or indirect, to obtain anti-mafia certification must last for the entire duration of their office, function or company or sports position.

### **3.6.5 YOUTH SECTOR**

The promotion of positive values in youth sport is a primary value for the Company, in the awareness that giving a good example to young people is the most direct way of teaching mutual respect.

To that end, the Intended Users, and especially the parties that operate in the youth sector, must comply with the principles, obligations and prohibitions set out under this Code.

Intended Users who act as scouts and buy and sell the players, especially in the youth sector, will have to work in compliance with prevailing laws, the guidelines defined by the Italian Volleyball Federation (FIPAV) and the organisation, management and control model pursuant to Legislative Decree no. 231/2001.

### **3.6.6 ATHLETES**

All athletes must comply with the principle of solidarity, therefore considering compliance with sporting values to be more important than the pursuit of success in the awareness that their behaviour helps keep the value of sport high.

Athletes must also undertake to comply with prevailing laws, the protocols defined by the model pursuant to Legislative Decree 231/2001 and what is defined in the internal company rules.

### **3.6.7 MEDICAL STAFF**

The medical staff must comply with national and international laws established in the area of the fight against doping, and guarantee that the health, safety and mental-physical wellbeing of athletes comes before any other consideration. The medical staff must not do anything that could harm the health of the athletes, must not advise, prescribe or administer drug treatments aimed at altering the performance of the athletes and immediately report this if they become aware of prohibited behaviour.

### **3.6.8 TECHNICIANS**

Technicians must transmit values such as respect, sportsmanship, civility and integrity to their players, that go beyond the individual sporting result and that lie at the basis of the sport itself. Therefore, trainers must always act in an ethically correct way with respect to all the components: athletes, colleagues, referees, managers, parents, fans and the media.

For example, the technicians are considered to be role models by the young people, and they must understand the strong influence that words and attitudes have with respect to the athletes that comprise their team. This is why the technicians have to comply with internal company rules and the provisions of the model pursuant to Legislative Decree 231/2001.

### **3.6.9 OPERATIONAL STAFF**

The operational staff comprise all the business partners, both volunteers and professionals, who provide their work in administrative, organisational and logistics areas to help pursue the objectives and smooth operation of the day-to-day operations of the Company. Each business partner will have to be armed with a strong sense of loyalty, honesty and respect with respect to anyone who works for the company, and hold values such as respect, sportsmanship, civility and moral integrity.

### **3.6.10 MEMBERS**

Where not expressly authorised, the Company managers, shareholders and members must not carry out any activity relating to the transfer, contractual transfer or membership of players and technicians unless in the exclusive interest of the Company and in full compliance with the applicable sporting regulations. Availing of and/or having contacts with mediators, player agents or members that have been inhibited to any extent or disqualified is also prohibited.

In relations with athletes, and with mediators or player agents, contracts that are not permissible under prevailing sports regulations and/or providing unjustified remuneration, premiums or compensation or in breach of said regulations is prohibited.

All members will also be obliged to comply with the general principles and rules of behaviour set out in the “Practical Guide - Membership” issued by the FIPAV, and forming an integral part herein.

### **3.6.11 FANS**

In its relations with fans, the Company undertakes to encourage loyal, responsible fans. To that end, no financial contributions can be made to the establishment and maintenance of groups, organised and non-organised, of its fans.

The Company opposes any behaviour that, directly or indirectly, causes offence or denigration for reasons of race, colour, religion, language, sex, nationality or origin or that could be construed as ideological propaganda prohibited by the law or in any case, that praises discriminatory behaviour or incitement to violence or xenophobia.

## **3.7 RULES OF BEHAVIOUR REGARDING UNLAWFUL SPORTS PRACTICES, BETTING AND DOPING**

Members, managers, employees and business partners who operate on behalf of You Energy Volley must not carry out actions aimed at changing the performance or result of sports competitions.

### **3.7.1 PROHIBITION ON BETTING**

All those who operate on behalf of You Energy Volley must not make or even merely facilitate, directly or through third parties, bets that relate to the results of the official competitions in which the Company takes part.

In particular no member, manager, employee, business partner or consultant of the Company may:



- unduly promise or pay amounts of money or goods in kind of any nature to promote or favour the interests of the Company or influence, including indirectly, the normal performance of the sports competitions;
- give advantages of any nature or put undue pressure on technicians, players or referees;
- carry out, using any means, actions aimed at changing the performance or result of a competition or game that the Company is involved in;
- make bets, directly or through third parties, on the results of Company competitions or of other competing teams;
- give confidential information to third parties, either of an economic-financial nature or relating to the technical-sports management of the team;
- go to places or environments where online betting can be carried out or where video slot machines are present;
- bet on any other sport or carry out any type of gambling;
- mix with people who bet either outside the Company or at any training sessions through which it would be possible to enter into contact with the betting world.

### **3.7.2 FIGHT AGAINST DOPING**

The Company is particularly sensitive to the protection of the health of its athletes, both the first team and the youth sector; the Company bases all its sporting activities on the proper use and administration of medicines, in accordance with prevailing national and international laws on doping. The use of any substance that violates anti-doping laws is prohibited and compliance with these principles must be carried out with extreme attention by all members, considering it to be a qualifying, essential element of the employment contract between the member and the Company.

All those who work for the Company must comply with both national and international law, regulations and standards (World Anti-Doping Agency) in the area of the fight against doping, including the sports regulations issued by CONI and the additional regulations issued by FIPAV.

### **3.7.3 POLICIES TO STAMP OUT UNLAWFUL ACTIONS**

If the Company, and for it the shareholders, the sole director, members of the audit bodies and legal bodies, the sports managers and all the employees or business partners of any nature, become aware of any unlawful action, fact or behaviour that is relevant at the level of sports law-statutes, committed either by internal parties, including technicians, athletes or members, and external parties, are obliged to immediately report the facts, both to the Federal Prosecutor's Office and the applicable judicial police and the Public Prosecution Service, according to their relevance.

The obligation to report also applies in the case of awareness of mere attempts at unlawful behaviour even though not yet completed.

### **3.8 SELECTION AND CONTRACTUAL RELATIONS WITH SUPPLIERS, PARTNERS AND SPONSORS**

Relations of the Company with suppliers, commercial partners, sponsors and third parties in general, public or private, must be carried out in accordance with the law and in compliance with the principles of integrity, transparency and verifiability, even if through third parties, and subject to specific due diligence.

All contracts must contain specific clauses with which the supplier undertakes to duly and fully comply with the principles of this Code, subject to the right of the Company to terminate the relationship and take action to obtain compensation for any damages.

### **3.9 PROTECTION OF PERSONAL DATA**

In the performance of its activities, in order to ensure the protection of personal data, the Company undertakes to process them in accordance with the applicable laws, and in particular in accordance with the following criteria: transparency with respect to the parties to whom the data refer, lawfulness and integrity in the processing, pertinence of the processing to the aims declared and pursued and guarantee of the security of the processed data.

### **3.10 MANAGEMENT OF ACCOUNTS AND FINANCES**

All company affairs must be adequately recorded in order to provide an accounting record that reflects the nature and substance of each transaction in accordance with the law and regulations.

Each person, upon request, will have to cooperate, within the scope of the activities carried out, in the performance of the controls and audits legally attributed to the shareholders, the company bodies and the auditors or the Supervisory Authorities specifically provided for under the law and federal regulations to ensure the information given to them is truthful, correct, complete and transparent.

The Company promotes all the measures aimed at proper management and tendentially in equilibrium with its financial assets in order to ensure full operation, from those standpoints, for the entire time at the applicable competition levels.

### 3.11 CONTRIBUTIONS AND SPONSORSHIPS

The Company, where it deems it advisable, provides contributions and sponsorships for cultural and sporting initiatives in accordance with prevailing laws and the principles contained in this Code.

In the selection of the cultural and sporting initiatives, the Company, its employees and business partners, will have to avoid any types of conflict of interest (for example kinship relations with the interested parties or links with bodies that could, for the duties carried out, favour the activities of the Company in some way). The Company will not give contributions or benefits of any nature to associations and/or groups of fans and supporters.

The Company, following a specific request from public and/or private third parties and where it is deemed it advisable, will receive contributions and sponsorships within the limits imposed by laws and regulations<sup>1</sup> and unrelated to the sports results.

In its sponsorship relationships, the Company undertakes to carry out adequate due diligence on the beneficiary and/or applicant. In any case, the Company will first evaluate the existence of a specific **link** between the business activity carried out by the company and the sponsor, or the sponsored party, which link must be measured with the probability that the sponsorship could bring a direct expectation of commercial return.

The Company requests its players, in their sponsorship contracts, to comply with the principles of this code in contractual relations to guarantee the image and reputation of the Company.

### 3.12 MASS MEDIA

Communications via media plays an important part in order to enhance the reputation of the Company. Therefore, relations between the Company and mass media will only be carried out by the bodies to which this authority is delegated, and must be carried out in line with the policies and instruments of communication defined by the applicable bodies, and with the laws, rules and codes of professional practice.

The information given to the outside world shall be inspired by criteria of authenticity and transparency. False news is absolutely forbidden.

The Intended Users must not provide information to communication bodies without having been specifically and previously authorised by the competent functions.

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<sup>1</sup> For example, so-called '**postponement and acceptance clauses**, through which a party who is outside the sports system, the sponsor, expressly agrees to align themselves with sporting regulations that may be issued by CONI, the Federation and the Sports Group it belongs to, the so-called **Olympic silence** (formally bylaw to Rule 40, par. 3: "*Except as permitted by the IOC Executive Board, no competitor, team official or other team personnel who participates in the Olympic Games may allow his person, name, picture or sports performances to be used for advertising purposes during the Olympic Games.*") which impose a series of limitations to use of the pictures of credited athletes by their individual sponsors during the so-called Olympic silence period.

## **4 IMPLEMENTATION OF THE CODE**

### **4.1 PREVENTION**

In accordance with prevailing laws and with a view towards planning and managing the activities of the Company, to improve effectiveness, honesty, transparency and quality, the Company has adopted organisational and management measures to prevent unlawful behaviour or in any case behaviour that is contrary to the rules of this Code by any party who acts for the entity.

### **4.2 REPORTS**

Any breach of the principles or provisions contained in this Code by the Intended Users will have to be promptly reported to the Guarantor of the Code.

The Guarantor of the Code will be in charge of evaluating the reports and informing the governing body, if necessary, suggesting what sanctions to apply.

In any case, the information and reports acquired, that arrive in written form, will be considered to be confidential and may not be disclosed unless required by prevailing law.

### **4.3 SANCTIONS**

Compliance with the rules contained in the Code must be considered to be an integral and essential part of the contractual obligations provided for the Company employees, in accordance with article 2104 of the Civil Code, and with specific reference to the members, in accordance with prevailing federal regulations. This is why the Company will request the addition of a specific clause into the contracts which have already been entered into at the time of disclosure of this Code, and for any future signings.

Any breaches of the Code will give rise to the application of sanctions against the employees, managers, directors, administrators and statutory auditors of the Company, also in accordance with the disciplinary system defined in the Organisation, Management and Control model pursuant to Legislative Decree no. 231/2001

The procedure for application and imposition of the disciplinary sanctions is defined in said Model, within the scope of the principles established by Law no. 300/1970 (Workers Statute) and for the sporting professionals/amateurs, by the related collective agreement.

## **5 ADDRESS OF CODE GUARANTOR**

Anyone who has news or grounded suspicions of breaches or evasion of the principles contained in this Code or the procedures defined in the Organisation, Management and Control Model, will report it through written communications on paper to the Supervisory Board of You Energy

Volley (Via Tirotti, 54 - 29122 Piacenza) or to its email address [Odv231@youenergyvolley.it](mailto:Odv231@youenergyvolley.it).