

ORGANISATION, MANAGEMENT AND CONTROL MODEL

**PURSUANT TO LEGISLATIVE DECREE
231/2001**

of



List of Revisions 231 Model

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1. LEGISLATIVE DECREE 231 OF 8 JUNE 2001

Italian Legislative Decree no. 231 of 8 June 2001 introduced “Administrative liability of legal persons, companies and associations, including those with no legal status” following the commission of offences into Italian law.

The decree applies following the commission of the following criminal offences:

- article 24: *undue receipt of funds, fraud against the state or a public entity or the European Union or to obtain public funding, ICT fraud against the state or against a public entity and fraud in public procurement;*
- article 24-bis: *cybercrime and unlawful data processing;*
- article 24-ter: *organised crime;*
- article 25: *embezzlement, extortion, illegal incitement to give or promise benefits, corruption or abuse of office;*
- article 25-bis: *forgery of money, public credit instruments, revenue stamps and distinctive signs and instruments;*
- article 25-bis 1: *offences against industry and commerce;*
- article 25-ter: *corporate offences;*
- article 25-quater: *crimes committed for the purpose of terrorism or subversion of the democratic order;*
- article 25-quater-1: *female genital mutilation practices;*
- article 25-quinquies: *crimes against the individual;*
- article 25-sexies: *market abuse;*
- article 25-septies: *crimes of manslaughter and grievous or severely grievous bodily harm committed with breach of laws governing accident prevention and the protection of hygiene and health at the workplace;*
- article 25-octies: *receiving stolen goods, money laundering or using money, assets or benefits of illegal origin and self-laundering;*
- article 25-novies: *offences relating to copyright infringement;*
- article 25-decies: *incitement not to provide statements or to provide untruthful statements to the Judicial Authorities;*
- article 25-undecies: *environmental crimes;*

- article 25-duodecies: *employment of illegally staying third country nationals*;
- article 25-terdecies: *xenophobia and racism*
- article 25-quaterdecies *fraud in sports competitions, abusive gambling or betting or gaming or exercised on prohibited mechanisms*;
- article 25-quinquiesdecies: *tax offences*;
- article 25 sexiesdecies: *smuggling*;
- *Transnational crimes.*

For a more complete and detailed examination of predicate offences, please refer to the Regulatory Appendix to be taken as an integral part of this organisation, management and control model.

In accordance with article 5 Legislative Decree 231/2001, in order for administrative liability to be claimed and charged against an entity, a natural person functionally connected to said entity will have to have committed (or attempted to commit) one of the above-mentioned criminal offences (referred to as predicate offences) and the criminal offence committed “in its (eds note, of the entity) interest or to its advantage”, providing as an exemption the hypothesis that the perpetrator “acted in his/her exclusive interest or in the interest of third parties”.

In order for administrative liability to attach to the entity, in tandem with the criminal liability of the perpetrator of the criminal offence (natural person), it will also be necessary for the criminal offence to have been committed by parties who hold managerial positions in the entity or parties in subordinate positions. More specifically, in accordance with article 5, “the entity is liable for criminal offences committed in its interest or to its advantage:

- a) by persons with representative, administrative or managerial authority for the entity or one of its organisational units with financial and functional autonomy and by persons who in fact manage or control it (persons in so-called top management positions);
- b) by persons subject to the management or supervision of one of the parties mentioned in letter a) (known as subordinates).

In accordance with well-established case law, administrative liability arising from a criminal offence also applies where there is a Group, even though with certain significant limitations and conditions, when, for example, it is one of the subsidiaries who commits a predicate offence under its responsibility (known as ascent of the liability).

In the case of ascertained liability, the Company will be liable for one of the following sanctions:

financial penalties, prohibitory penalties, confiscation (ordered with a ruling against the entity) and publication of judgment.

In reference to the financial penalty, a share-based calculation system was established, to be determined in terms of quantity and value, in order to more accurately adapt the extent of the sanction to the actual facts of the case.

Financial penalties range from a minimum of 25,823.00 euros to a maximum of about 1,549,360.00 euros.

On the other hand, prohibitory penalties are: the prohibition on performing the business activity; suspension or removal of the authorisations, licences or permits enabling the unlawful action to be committed; prohibition from entering into contracts with the public authorities, apart from the right to obtain public services; exclusion from the right to obtain incentives, funding, contributions or grants and the possible removal of any previously granted; prohibition from advertising for goods or services.

Unlike the financial penalties that always apply, the prohibitory penalties apply to the extent expressly provided for by law and on condition that at least one of the conditions referred to by article 13 of the Decree have been met.

The prohibitory penalties have a duration of not less than three months and not more than two years.

Article 6 of the Decree therefore provides that if the criminal offence has been committed by senior managers, the entity will not be liable on an administrative basis if it can prove that:

- the governing body adopted and effectively implemented, before commission of the fact, suitable organisation and management models to prevent criminal offences of the type committed;
- the duty to monitor the performance and compliance with the models, and to oversee their updating, has been entrusted to a body of the entity with independent powers of initiative and control;
- the people committed the criminal offence by fraudulently getting around the organisation and management models;
- there was no lack or insufficient oversight by the body described under letter b).

In this sense, the underlying goal of Legislative Decree 231/2001 is to encourage enterprises to set up an organisation, management and control model which aims to pursue a “new way of doing business” in accordance with a “prevention culture”.

In order to obtain effective exemption, the organisation and management model must meet the requirement of:

- identifying the activities within which scope the criminal offences could be committed;

- providing for specific protocols aimed at planning the training and implementation of the decisions of the entity in relation to the criminal offences to prevent; identifying the management mechanisms of the financial resources that can help prevent commission of the criminal offences;
- providing for information obligations with respect to the body engaged to monitor the performance and compliance with the models;
- introducing a disciplinary system that can punish the failure to comply with the measures indicated in the model.

The organisation and management model, in accordance with articles 12 and 17 of Legislative Decree 231/2001, has restorative effectiveness if the entity adopts and puts into operation, before the declaration of initiation of a first level hearing for a criminal offence which has already been committed, an organisation and management model that can prevent criminal offences of the nature of the one that occurred (known as ex-post model). In this case, the entity will obtain a reduction of the financial penalties and exemption from the prohibitory penalties.

2. GENERAL INFORMATION ON THE COMPANY

2.1 The Company and its values

You Energy Volley S.S.D.R.L. was established in July 2018 through the determination, business and managerial skills, passion and professionalism of two historic Piacenza companies: Gas Sales Energia and Banca di Piacenza, with the aim of safeguarding and promoting territorial excellence and to foster the passion of the fans.

The team takes part in the *SuperLega* male volleyball championship along with another twelve teams from all over Italy.

From its initial establishment, the Company has always strongly believed in the social and cultural function of sport, being aware that:

- giving a good example to young people is the most direct way of teaching mutual respect;
- its image and reputation are values that have to be protected and developed, including through the full promotion, sharing and compliance with ethical, loyalty and sportsmanship principles;
- fair play, sporting honour and loyal cooperation are essential values that incorporate the concepts of friendship, respect for others and sportsmanship and include combatting 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;
- the “person” is the key resource of the Company: respect, opportunities for growth and development and the recognition of personal merits represent the guiding principles.

The Company adopted “The Code of Ethics which 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 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.

The enhancement of the value of the culture and the sporting spirit and the development and promotion of the territory are the ideals guiding the Company in its strategic choices. This is how You Energy Volley became the first sporting society to obtain the CO2 free certificate from Bureau Veritas in the 2018/2019 season, registering zero impact in terms of carbon dioxide in the atmosphere. The measures undertaken by the Company in the area of environmental protection included: the reduction of plastic using stainless steel bottles; the use of light and gas from renewable sources and the adoption of electric cars.

In addition to reducing emissions, the Piacenza Company also funded a certified gold standard United Nations project in developing countries. More specifically, the club (sporting white and red colours) decided to invest in an initiative linked to the construction of drinking water wells in Eritrea which operate on solar energy and allow for the reduction, and in some cases eliminating carbon monoxide in homes, also reducing the consequences of respiratory illnesses in the residents of the African nation.

2.2 Governance

The governance structure of You Energy Volley S.S.D.R.L. calls for the presence of two Shareholders who hold the ownership of the team in accordance with the respective shares, and a Sole Director with administrative and representation functions, vested with the broadest powers for the ordinary and extraordinary management of the Company, and who has the right to carry out all actions that he/she considers appropriate to achieve the company purpose and that have not been attributed to the exclusive competence of Shareholder decisions in accordance with the law, the memorandum of association, the appointment or in the articles of association.

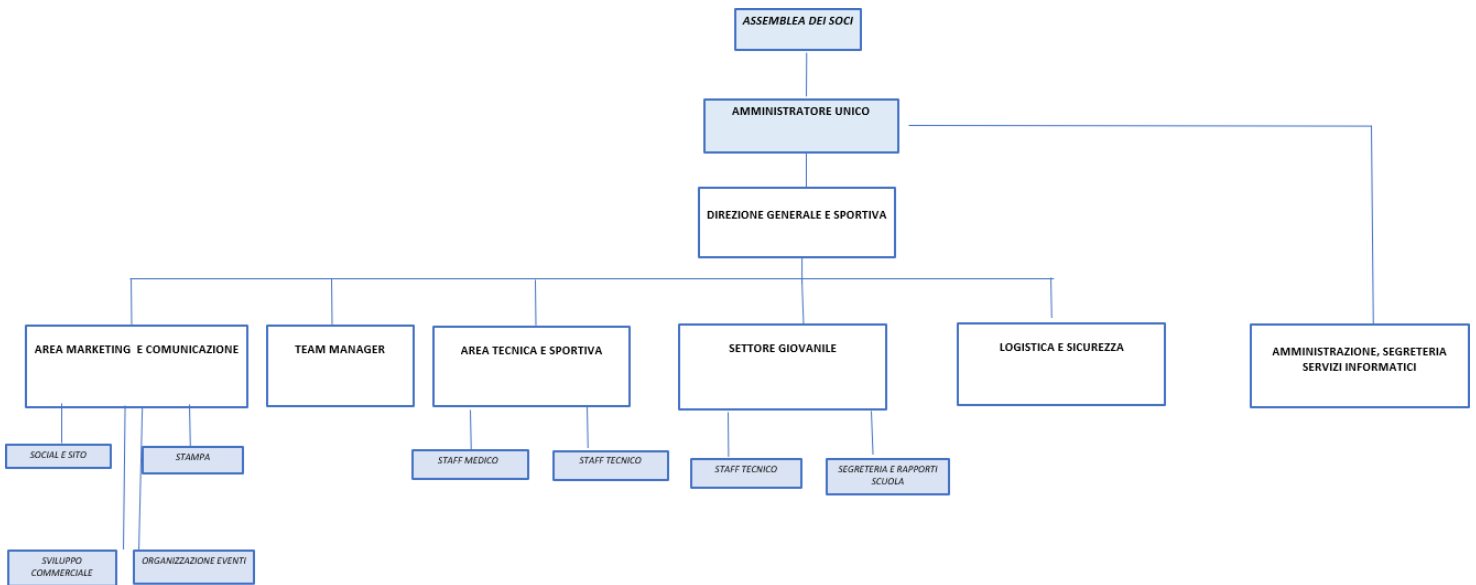
You Energy Volley has also engaged an auditor to carry out the audit of the financial statements for the year of the Company and to check to ensure that the company accounts are kept properly and that the company affairs and transactions are correctly entered in the accounting documents.

The sporting world is managed by the General Management that is responsible for managing and organising the technical-sporting aspects (such as buying and selling players, management of the first team, scouting, management of company memberships, relations with other sporting companies, formalisation of player acquisition negotiations, signing agreements to transfer players, signing player work contracts (sporting services), management of travel, supervision of the organisation of training and training sessions, supervision of criteria for registering with the championship, youth area).

The General Management is supported in its management of the activities and the team by

technical staff and medical staff.

For the sake of giving complete information, the organisation chart of the Company is shown below:



3. THE ORGANISATION, MANAGEMENT AND CONTROL MODEL

3.1 Goals and objectives pursued in the adoption of the model

You Energy Volley is sensitive to the need to ensure conditions of fairness and transparency in the running of its business affairs and company activities, to protect its position and image, the work of its employees and the expectations of its stakeholders, and is aware of the importance of equipping itself with an internal control system that can prevent the commission of unlawful actions by its directors, employees, associates and business partners. The Company adopted the organisation and management model with the awareness that an efficient, balanced organisation of the business, that can prevent the commission of criminal offences, is pursued by mainly intervening in the processes of training and implementation of the Company's decisions, on preventive and subsequent controls, and on flows of both internal and external information.

Through the adoption of the Model, You Energy Volley proposes pursuing the following main purposes in particular:

- raise awareness of everyone working in the name of and on behalf of the Company to ensure a business culture imbued with legality and give them the awareness that if the provisions reported herein are breached, it could give rise to the commission of unlawful actions liable to criminal penalties that could be applied against them and administrative penalties charged to the Company;
- repeat that said forms of unlawful behaviour are strongly condemned by the Company since they (also in the case in which the Company is only apparently in a position to obtain an advantage) are in any case contrary to both legal provisions and the ethical principles which the Company intends to abide by in the implementation of its corporate mission;
- permit the Company to promptly intervene to prevent or oppose the commission of the criminal offences through the promotion of a culture of control aimed at governing all the decision-making and operational stages of company activities and the monitoring of areas of activity at risk.

The model and the principles contained in it apply to the corporate bodies, employees, business partners, consultants, suppliers, partners, and more generally, to all those who, in any capacity, work in sensitive areas on behalf of or in the interest of You Energy Volley (hereinafter the "Intended Users").

3.2 The methods adopted to implement the model

In accordance with the provisions of Legislative Decree 231/2001 (and more specifically, article 6) and illustrated in the Guidelines of the specialist associations used, as well as being defined by consolidated case law, the organisation model has been devised as the final result of a series of complex activities. This is to ensure that adoption of the model can represent an effective and efficient prevention tool through the adoption of a general, complete and suitable system of internal controls.

The activities needed for its implementation and/or for its review/update are organised into the following stages:

- Identification of the sensitive activities, i.e., those activities or process stages that provide for a significant exposure to the risk of committing (or attempting) criminal offences.
- Holding interviews with the various people in charge of the process on the operating activity mechanisms in order to also highlight the existing control system and the applicable documentation.
- On the basis of the results obtained, comparison of the existing procedures, the level of defined controls, the level of awareness and dissemination of them and the highlighted activities at risk, in order to define and formalise the Gap analysis of the Company and evaluate the areas and/or activities that are not sufficiently supervised to guarantee the effectiveness of the organisation and management model.
- After having finalised the evaluation mentioned above, definition of the criticality level for each sensitive activity on the basis of the level of control and potential risk. The control for sensitive activities is determined by checking the presence and adequacy of the standards of control defined by Confindustria. The potential risk for the sensitive activities is determined by starting from the severity of the sanctions for the related criminal offence, i.e., the maximum extent of the applicable penalty (administrative and/or prohibitory).
- Following the identification and acceptance of the criticality level for each sensitive activity, identification of the actions and countermeasures to manage the risk defined (mitigation, acceptance, transfer and elimination).
- Adoption of prevention and control measures in the documentation comprising the model:

- formalisation and/or integration of the existing documentation of the Company with the activities and controls defined and/or the production of documentation on new laws;
 - update of the organisation and management model as a summarised document and reconciliation of the principles, rules of behaviour, defined protocols, specific measures of prevention and control, interested bodies and parties and the penalty system;
 - definition and update of the information flow system, in particular, highlighting the purpose of the information flow, the party in charge and the sampling frequency.
- Planning of the different training activities and auditing of the processes identified as exposed to the risk of committing criminal offences.

4. Characteristics and structure of the internal control system

4.1 The principles of the Internal Control System

The internal control system is classified as the set of instruments aimed at providing a reasonable guarantee of the achievement of the operating effectiveness and efficiency targets, reliability of the information, compliance with the law and regulations, and safeguarding the assets, including against possible frauds of unlawful activities.

As defined by the Confindustria Guidelines, the elements characterising the control system are:

- formalisation of the control system in specific company documentation aimed at defining and governing mechanisms and timescales of the activities relating to the controls themselves and also the performance of supervisory controls;
- traceability in order to record and check the performance of the controls confirming the characteristics and reasons behind the individual operations and also in order to permit the clear identification of the person who authorises, performs, records and checks the operation itself;
- segregation in order to ensure the separation of functions, i.e., preventing the management of the entire process being carried out independently by a single person;
- attribution of the authorising powers (delegations of authority and powers of attorney) where it is possible and advisable to distribute them in line with the corporate organisation in order to avoid attributing unlimited powers, and especially, the clear awareness of the powers and responsibilities inside and outside the organisation.

4.2 The sources of the Internal Control System

The main sources of the Internal Control System of the Company can be found in:

- Code of Ethics, a document that illustrates the values-guidelines of the Company, recommending, promoting or prohibiting certain behaviour and, if necessary, setting out specific prohibitions and requirements in relation to the criminal offences considered. This should be considered to be the essential basis of the model since the provisions contained in the second assume compliance with the provisions of the first, together forming a systematic body of internal rules aimed at disclosing a culture of ethics and corporate transparency;
- Organisation and management model of You Energy Volley that describes the measures of prevention and control aimed at preventing the criminal offences provided for under Legislative Decree 231/01 and its regulating principles;

- Internal operational documentation, especially the set of organisational procedures, and the contractual documentation that defines the corresponding general principles in the management of the corporate processes.

4.3 Modular structure of the Control System

The Company has adopted a control system organised into the following levels:

- I Level Controls, are represented by the “line controls” are carried out by the department managers or through external professional figures; the timeframes for checking and control defined by the company operating procedures fall within this category.
- II Level Controls, normally aimed at monitoring the risk management and control process; for example, the key performance indicators (KPI) fall within this category.
- III Level Controls, if necessary, aimed at providing assurance and carrying out independent assessments on the design and operation of the overall Internal Control System (including through engaging external consultants for the audit, audit by the Supervisory Board and any certification entities).

5. EXPOSURE TO RISK

5.1 The Sensitive Areas

In light of the risk analysis carried out to prepare this model, the exposure to the risk of committing criminal offences for each company area is identified below.

Criminal offences	Paragraph	Company processes
Legislative Decree no. 231/01		
Article 24 Article 25	(see 5.2)	<ul style="list-style-type: none"> ▪ Governance ▪ Relations with the public authorities ▪ Administration and accounting ▪ Procurement ▪ HR ▪ Sporting-technical management ▪ Marketing and communication
Article 24-ter	(see 5.3)	<ul style="list-style-type: none"> ▪ Administration and accounting ▪ Procurement
Article 25-ter	(see 5.4)	<ul style="list-style-type: none"> ▪ Governance ▪ Administration and accounting ▪ Procurement ▪ HR ▪ Sporting-technical management ▪ Marketing and communication
Article 25-septies	(see 5.5)	<ul style="list-style-type: none"> ▪ Governance ▪ Sporting-technical management ▪ Occupational health and safety
Article 25-octies	(see 5.6)	<ul style="list-style-type: none"> ▪ Governance ▪ Administration and accounting ▪ Procurement ▪ HR ▪ Marketing and communication
Article 25-decies	(see 5.7)	<ul style="list-style-type: none"> ▪ Governance
Article 25-duodecies	(see 5.8)	<ul style="list-style-type: none"> ▪ Sporting-technical management

Article 25-terdecies	(see 5.9)	<ul style="list-style-type: none"> ▪ Social media
Article 25-quaterdecies	(see 5.10)	<ul style="list-style-type: none"> ▪ Governance ▪ Procurement ▪ Sporting-technical management
Article 25-quinquiesdecies	(see 5.11)	<ul style="list-style-type: none"> ▪ Governance ▪ Administration and accounting

The results of the mapping permitted the following:

- to identify the organisation unit of the Company that, in consideration of the duties and responsibilities attributed, could potentially be involved in the criminal offence risk activities; to identify the main cases of risk/criminal offence;
- to outline the possible mechanisms of realisation of the unlawful behaviour.

5.2 Criminal offences against the Public Authorities (articles 24 and 25 Legislative Decree 231/2001)

The definition of Public Authorities

The public authorities are deemed to be all the public entities, territorial entities and non-territorial entities, the members and the internal bodies of the entities, including public officials.

Within the scope of the parties who act within the scope and in relation to the public authorities, for the purposes of integrating the cases of predicate offences pursuant to Legislative Decree no. 231/2001, the figures of “Public Officials” and “Public Servants” governed by articles 357 paragraph I and 358 of the Criminal Code take on relevance.

Article 357 of the Criminal Code defines a Public Official as *“anyone who exercises a legislative, judicial or administrative public function”*.

Considering that a “public function” is the administrative activity that constitutes the exercise of decision-making powers or authorisation powers, or certifying powers, it can be confirmed that the classification of public official is therefore given to parties, public or private employees, who can or must, within the scope of a power governed by public law, create or express the intentions of the public authorities, or exercise authorisation or certification powers

(for example, the employee of a public authority with powers of certification).

On the other hand, article 358 of the Criminal Code defines public servants as *“those who, in any capacity, provide a public service”*.

Considering that a “public service” must refer to an activity governed the same way as a public function, but characterised by a lack of the powers that typify a public function, and excluding the performance of simple rank and file jobs and merely material labour, case law has identified the category of public servants, placing the emphasis on the instrumental or accessory nature of the activities compared to a public activity in the narrow sense. A series of “detector indices” were therefore identified to examine whether an Entity is public or not. In particular, reference is made to the following indices: being subject to a control activity in the nature of social purposes, and a power to appoint and revoke the appointment of directors by the state or other public entities; the presence of an agreement and/or licence with the public authorities; financial contribution from the state; the immanence of the interest to economic activities.

On the basis of the above, the discriminating element to indicate whether a party can be classified as a “public servant” or not is not represented by the legal nature of the Entity, but by the functions entrusted to the party, which must entail taking care of public interests or meeting general interest requirements.

Exposure to risk

The results of the risk analysis led to the identification of the following company processes in which You Energy Volley is more exposed to the risk of committing the criminal offences governed by articles 24 and 25 of Legislative Decree 231/2001:

Governance	<ul style="list-style-type: none"> ▪ Organisation and assignment of powers ▪ Management of conflicts of interest
Relations with the public authorities	<ul style="list-style-type: none"> ▪ Management of relations with sporting federations ▪ Management of relations with the public authorities during inspections
Administration and accounting	<ul style="list-style-type: none"> ▪ Accounts receivable ▪ Accounts payable ▪ Management control
Procurement	<ul style="list-style-type: none"> ▪ Procurement management ▪ Definition and selection of suppliers
HR	<ul style="list-style-type: none"> ▪ Selection and hiring staff
Sporting-technical management	<ul style="list-style-type: none"> ▪ Medical-sporting management ▪ Selection and membership of players and technical staff ▪ Management of team relations and logistics
Marketing and communications	<ul style="list-style-type: none"> ▪ Management of marketing and sponsorship

In addition to the activities that provide for direct contact with the public authorities (for

example management of relations with sporting federations or in the case of inspections), and therefore that physiologically expose the Company to the risk of committing criminal offences (for example the criminal offence of bribery with respect to inspection agents to avoid the imposition of a sanction), including the procurement processes, the human resources, marketing and the related administrative processes can be considered to be exposed to the risk of committing acts of bribery.

For example, the agreement of a contract for non-existent services may constitute a way for a Public Official or Public Servant to obtain, directly or indirectly, its cost, just as the issue of invoices for non-existent operations, or for higher amounts than the value of the service may be a way to establish off-balance sheet funds to be used for the purpose of bribery. Additionally, the definition and issue of an order to a supplier that does not comply with the parameters established by the Company or hiring unsuitable staff could be a corrupt element of exchange in exchange for favourable treatment for the Company by a public principal. A further example could be the offer or settlement of money or other benefits to a public official or public servant in order to obtain unfair advantages or forms of benefits when sporting federations are making decisions or orders.

The criminal offences that could apply in relations with the public authorities also include the criminal offence of incitement not to make declarations or to make untruthful declarations to the legal authorities provided however under article 25-decies.

Prevention measures

With regard to the activities and controls implemented to prevent criminal offences against or to the harm of the public authorities, the system of internal controls is described by the following company documentation:

- **Code of Ethics:** which expressly prohibits all types of bribery, unlawful favours, collusive behaviour, direct and/or indirect requests for personal advantages, referring to compliance with the principles of honesty, integrity and fair dealing and also defines specific principles of behaviour in the area of conflicts of interest, relations with suppliers and staff relations.
- **Powers of attorney and delegations of authority system** which defines the authorisation and control powers, assigning them in accordance with working practices, expressly providing what parties have the power to interact with the public authorities or public servants in the name of and on behalf of the Company.

- **Policy of managing relations with the public authorities and public parties** that defines specific prohibitions and rules of behaviour in relations with the public authorities, during inspections or contacts with Federal Bodies, providing for specific measures of prevention and control when taking part in inspection reports, signing and filing documentation and giving information reports to Management.
- **Administration, accounting and financial procedure** that defines roles and responsibilities, and specific control measures in relation to the accounts receivable (filing reports on sponsorship agreements, with the definition of the amount, mechanisms and timeframes for invoicing and payment dates, monthly issue of sales invoices, daily reconciliations, registration of the account receivable flows on an accounting software/application), the accounts payable (reception of invoices through SDI (interchange system), checking the formal validity of invoices, checking the adequacy of the invoice and checking supporting documentation, recording invoices on the systems, management of anomalies through the request for additional documentation, recording invoices payable on the payment schedules, creation of payment orders through home banking, payment authorisations by the parties with the signatory powers, the management of treasury activities (daily reconciliation of incoming and outgoing financial flows, expenses incurred and reinstatement of petty cash) and providing for specific information flows on the reporting to the Company.
- **Entertaining expense policy** that defines specific control measures and limits with regard to entertainment expenses.
- **Purchasing procedure** that defines roles and responsibilities, and specific measures of control relating to the checks on purchasing requirements and issue of purchasing requests, definition and selection of suppliers (in accordance with the type/value of the procurement), approval procedures, management of the purchase, provision for the specific 231 clause, checking the procured goods/services.
- **Internal member rules** that define roles and responsibilities and specific control measures in the area of membership and management of staff/business partners, with specific reference to: criteria for the selection and choice of players/business partners/technical staff and authorisation by the party with the necessary powers, membership mechanisms, traceability and communications to the League.
- **HR procedure** that defines roles and responsibilities and specific control measures, with special reference to the selection and hiring mechanisms for staff and the selection of business partners, the evaluation of resources and business partners selected,

authorisation to hire staff and the types of contracts, and in matters regarding the administrative management of the staff.

- **Marketing and communication procedure** that defines roles and responsibilities and specific measures of control with particular reference to the activities of due diligence on the company requesting/benefitting from the sponsorship, the declarations on situations of potential conflict of interest by the sponsoring partners, the definition of price lists linked to sponsorships, the evaluation of sponsorship proposals by Management.

5.3 Organised crime (article 24-ter Legislative Decree 231/2001)

The extension of liability to entities also for organised crime offences committed in the territory of the state is aimed at counteracting the commission of any type of criminal offence, provided it is on an associative basis or on a stable or continuous conspiracy basis and organised by at least three parties: this logic ensures that even unlawful actions that are not formally included in the classes of criminal offences governed by Legislative Decree 231/2001 can result in the administrative liability of You Energy Volley if committed on an associative basis.

For example, the issue/receipt of invoices for non-existent services under particularly advantageous or onerous conditions as a form of benefit to give to parties linked to criminal or terrorist associations or the fake requirement to purchase/erroneous or improper management of the procurement process with a supplier that is somehow, including indirectly, linked to criminal associations to fund it in exchange for any benefit.

Exposure to the risk

The results of the risk analysis led to the identification of the following company processes in which You Energy Volley is more exposed to the risk of committing the criminal offences governed by article 24-ter of Legislative Decree 231/2001:

Administration and accounting	<ul style="list-style-type: none"> ▪ Accounts receivable ▪ Accounts payable ▪ Management control ▪ Treasury
Procurement	<ul style="list-style-type: none"> ▪ Procurement management

Prevention measures

With regard to the activities and controls implemented to prevent organised crime offences, the system of internal controls is described by the following company documentation:

- **Code of Ethics:** which expressly rejects all forms of cooperation and facilitation in full compliance with prevailing laws and on the basis of the general principles of integrity, transparency, honesty, cooperation and loyalty.
- **Powers of attorney and delegations of authority system** which defines the authorisation and control powers, assigning them in accordance with working practices
- **Administration, accounting and financial procedure** that defines roles and responsibilities, and specific control measures in relation to the accounts receivable (filing reports on sponsorship agreements, with the definition of the amount, mechanisms and timeframes for invoicing and payment dates, monthly issue of sales invoices, daily reconciliations, registration of the account receivable flows on an accounting software/application), the accounts payable (reception of invoices through SDI (interchange system), checking the formal validity of invoices, checking the adequacy of the invoice and checking supporting documentation, recording invoices on the systems, management of anomalies through the request for additional documentation, recording invoices payable on the payment schedules, creation of payment orders through home banking, payment authorisations by the parties with the signatory powers, the management of treasury activities (daily reconciliation of incoming and outgoing financial flows, expenses incurred and reinstatement of petty cash) and providing for specific information flows on the reporting to the Company.
- **Purchasing procedure** that defines roles and responsibilities, and specific measures of control relating to the definition and selection of suppliers (in accordance with the type/value of the procurement), approval procedures and provision for the specific 231 clause in the contracts.

5.4 Corporate crimes (article 25-ter Legislative Decree 231/2001)

The type of criminal offences in question is of particular relevance both for the various activities that would expose the Company to the risk of committing the criminal offence and for the multiple legal interests protected by the laws referred to under article 25-ter of Legislative Decree 231/2001 (transparency of corporate information, integrity of the corporate assets, etc.).

The first action refers to Law 190/2012 with which liability was also extended to Companies to whose advantage or in the interests of which money or other benefits were given or promised in favour of directors, the general manager, the financial reporting manager, statutory auditor or receiver so that he/she would carry out or fail to carry out actions in breach of the obligations relating to his/her office or the obligations of loyalty, causing harm to (his/her) Company (corruption pursuant to article 2635, paragraph III of the Civil Code); on the other hand, the second one refers to Law 69/2015 which rewrote the offence of false corporate reporting pursuant to articles 2621-2622 of the Civil Code, with significant effects also on Legislative Decree 231/2001.

Law no. 3/2019 recently expanded the range of predicate offences with the case “incitement to private-to-private corruption” which punishes actions that would induce or instigate private corruption with those actions referring to the promise or offer, either direct or indirect, of money or other benefits which are not due.

Exposure to the risk

The results of the risk analysis led to identification, within the scope of company processes, of the following corporate areas, as those to which You Energy Volley is more exposed to the risk of committing the criminal offences governed by article 25-ter of Legislative Decree 231/2001:

Exposure to the risk

The results of the risk analysis led to the identification of the following company processes in which You Energy Volley is more exposed to the risk of committing the criminal offences governed by article 25-ter of Legislative Decree 231/2001:

Governance	<ul style="list-style-type: none"> ▪ Organisation and assignment of powers ▪ Management of conflicts of interest
Administration and accounting	<ul style="list-style-type: none"> ▪ Accounts receivable ▪ Accounts payable ▪ Management control ▪ Treasury ▪ Preparation of financial statements and management of tax charges

Procurement

- Procurement management
- Definition and selection of suppliers

HR

- Administrative management of staff
-

Sporting-technical management	<ul style="list-style-type: none"> ▪ Medical-sporting management ▪ Selection and membership of players and technical staff
Marketing and communications	<ul style="list-style-type: none"> ▪ Management of marketing and sponsorship

The activities listed above could expose the Company to the following criminal offences (as long as they are carried out in the interests of or to its advantage): false corporate reporting, false corporate reporting to the harm of the shareholders or the creditors, impeding controls, hindering the exercise of the functions of the public supervisory authorities, transactions that would harm creditors, private-to-private corruption.

With regard to private-to-private corruption, even though the Strasbourg Convention intends to punish the behaviour of anyone who gives or promises undue advantages and anyone who receives the settlement or promise of said advantage in order to carry out an action contrary to his/her duties (therefore corruption and bribery), article 25-ter of Legislative Decree 231/2001, as currently formulated with respect to partial reference to article 2635 of the Civil Code (only paragraph III), gives the entity responsibility arising from the commission of corruption only. Therefore, this could include the simulation of a purchasing requirement or the improper management of the procurement process in order to establish funding to be used for corrupt purposes; or the selection of a supplier without regard to the criteria of effectiveness/efficiency/affordability in order to reward specific interests or omitting the required due diligence.

Prevention measures

With regard to the activities and controls implemented to prevent corporate offences, the system of internal controls is described by the following company documentation:

- **Code of Ethics:** which illustrates the Company guidelines, expressly recommending the rejection of all forms of cooperation and facilitation in full compliance with prevailing laws and on the basis of the general principles of integrity, transparency, honesty, cooperation and loyalty, implementing and using suitable instruments to identify, prevent and manage the risks of any nature, fraud and improper behaviour.

- **Powers of attorney and delegations of authority system** which defines the authorisation and control powers, assigning them in accordance with working practices.
- **Administration, accounting and finance procedure** that defines roles and responsibilities and specific control measures in relation to the management of accounts receivable and payable, management of the treasury activities, the veracity, completeness, accuracy and precision of the accounting data and information and endeavouring to prepare accurate and complete economic data for a clear, truthful and correct representation of the company affairs and providing for specific information flows when reporting to the Company.
- **Purchasing procedure** that defines roles and responsibilities, and specific measures of control relating to the definition and selection of suppliers (in accordance with the type/value of the procurement), approval procedures and provision for the specific 231 clause in the contracts.
- **Internal member rules** that define roles and responsibilities and specific control measures in the area of membership and management of staff/business partners, with specific reference to: criteria for the selection and choice of players/business partners/technical staff and authorisation by the party with the necessary powers, membership mechanisms, traceability and communications to the League.
- **HR procedure** that defines roles and responsibilities and specific control measures, with special reference to the selection and hiring mechanisms for staff and the selection of business partners, the evaluation of the resources and business partners selected, the authorisation to hire staff and the types of contracts, and with respect to the administrative management of staff.
- **Marketing and communication procedure** that defines roles and responsibilities and specific measures of control with particular reference to the activities of due diligence on the company requesting/benefitting from the sponsorship, the declarations on situations of potential conflict of interest by the sponsoring partners, the definition of price lists linked to sponsorships, the evaluation of sponsorship proposals by Management.

5.5 Crimes of manslaughter and grievous or severely grievous bodily harm committed by breach of the laws on accident prevention and the protection of hygiene and health at the workplace (article 25-septies Legislative Decree 231/2001)

Implementing decree of Law 123/2007 with respect to management of safety at the workplace, cites the organisation, management and control models, confirming that an organisation and management model suitable for effectively exempting legal persons, companies and associations, including those without legal personality pursuant to Legislative Decree no. 231 of 8 June 2001, from administrative liability, must be adopted and effectively implemented, ensuring a company system that can fulfil all legal obligations relating to:

- compliance with the technical-structural legal standards relating to equipment, systems, workplaces, chemical, physical and biological agents;
- the risk evaluation activities and preparation of the consequent prevention and protection measures;
- activities of an organisation nature such as emergencies, first aid, management of tender contracts, periodic safety meetings, consultations with worker representatives for safety;
- healthcare oversight activities;
- information and training to workers;
- oversight with reference to compliance with the work safety procedures and instructions by the workers;
- the acquisition of legally obligatory documentation and certifications;
- periodic controls to ensure the procedures adopted are effective and are applied.

The organisation and management model pursuant to the first paragraph must provide for suitable registration systems showing that the activities noted above have been put into effect.

In any case, the organisation model must provide, to the extent requested by the nature and size of the organisation and the type of activity carried out, an organisation of functions that ensures the technical skills and powers needed for the checking, evaluation, management and control of the risk, and a disciplinary system that is suitable to punish the failure to comply with the measures indicated in the model.

The organisation model must also provide for a suitable system of checks on the implementation of said model and on its maintenance over time to ensure the measures adopted are still suitable. The review and amendment, if necessary, of the organisation model must be carried out when significant breaches of the laws relating to the prevention of accidents and hygiene at the workplace are discovered, or when there are changes in the organisation and in the activities in relation to scientific and technological progress.

Upon first application, the company organisation models defined in accordance with the UNI-INAIL guidelines for a health and safety at the workplace management system (SGSL) of 28 September 2001 or ISO 45001:2018 will be assumed to comply with the requirements pursuant to the previous paragraphs for the corresponding sections. For the same purpose, other company organisation and management models may be indicated by the Commission pursuant to article 6.

Exposure to the risk

The definition of sensitive activities in accordance with the Decree was carried out by considering the activities in which accidents could occur, and those in which the Company could commit the intentional breach of the laws and prevention measures. In view of said dichotomy, the following may be distinguished:

- the activities at risk of accident or occupational disease set out in the Risk Assessment Document and intended as activities where damage could potentially occur;
- the activities at risk of criminal offence, referring to the activities that could potentially give rise to the criminal offences referred to under article 25-septies of the Decree, since failure to implement or ineffective implementation could expose the Company to liability within the scope of management responsibility as part of the management of the resources when carrying out the service.

The results of the risk analysis led to the identification of the following company processes in which You Energy Volley is more exposed to the risk of committing the criminal offences governed by article 25-septies of Legislative Decree 231/2001:

Governance	<ul style="list-style-type: none"> ▪ Organisation and assignment of powers ▪ Management of conflicts of interest
Sporting-technical management	<ul style="list-style-type: none"> ▪ Management of team relations and logistics

Occupational health and safety

- Risk evaluation
 - Emergency management
 - Healthcare monitoring
 - Training and communications
-

Prevention measures

With regard to the activities and controls implemented to prevent accident prevention and health and hygiene related criminal offences, the system of internal controls is described by the following company documentation:

- **Code of Ethics:** that defines the principles and behaviour to protect the health and safety of the workers, members and business partners, in full compliance with prevailing laws with respect to environmental protection and the prevention of accidents at work and the protection of the workers.
- **Powers of attorney and delegations of authority system** which assigns the authorisation and control powers on a consistent basis, and identifies the parties in charge of:
 - implementing the necessary information and training on the general and specific risks of work, on safety provisions and the means, measures and activities relating to prevention adopted, on the dangers connected to the use of substances and the obligations that the law also imposes on workers in matters of prevention;
 - assigning jobs to workers taking account of their abilities and conditions in relation to their health and safety;
 - drawing up and implementing emergency measures, if necessary, in first aid, fire prevention, evacuation of the workers and for serious and immediate hazards.
- **Housing and travel policy** which defines the standards of the Company, and specific control elements in relation to the activities linked to the assignment of properties or the management of the logistics (for example environmental and safety standards linked to the property to assign to players, the facilities used for travel, the means of transport).
- **Accident prevention and health and hygiene related Documentation:** relating to the risk assessment, emergency management (accidents and near accidents), healthcare monitoring and training and communications.

5.6 Receiving stolen goods, money laundering, self-laundering and using assets of illegal origin (article 25-octies Legislative Decree 231/2001)

You Energy Volley could be liable pursuant to Legislative Decree 231/01 if one of the criminal offences pursuant to articles 648, 648-bis, 648-ter or 648-ter 1 of the Criminal Code are committed to its advantage or in its interests, or in the case in which a top manager or subordinate should acquire, receive or hide money or items with a criminal provenance, replace or transfer money, goods or other benefits that originate from crime, also committed by the

same perpetrator (known as self-laundering) or in some way uses money, goods or other benefits with criminal provenance in economic or financial activities.

Exposure to the risk

The results of the risk analysis led to the identification of the following company processes in which You Energy Volley is more exposed to the risk of committing the criminal offences governed by article 25-octies of Legislative Decree 231/2001:

Governance	<ul style="list-style-type: none"> ▪ Organisation and assignment of powers ▪ Management of conflicts of interest
Administration and accounting	<ul style="list-style-type: none"> ▪ Accounts receivable ▪ Accounts payable ▪ Treasury
Procurement	<ul style="list-style-type: none"> ▪ Procurement management
HR	<ul style="list-style-type: none"> ▪ Selection and hiring staff
Marketing and communications	<ul style="list-style-type: none"> ▪ Management of marketing and sponsorship

Prevention measures

With regard to the activities and controls implemented to prevent the criminal offences of receiving stolen goods, money laundering, self-laundering and using assets of illegal origin, the system of internal controls is described by the following company documentation:

- **Code of Ethics:** that illustrates the guiding principles of the Company and prohibits the replacement or transfer of money, goods or other benefits originating from unlawful activities, or carrying out, in relation to them, other transactions that would prevent the identification of their provenance.
- **Powers of attorney and delegations of authority system** which defines the authorisation and control powers, assigning them in accordance with working practices
- **Administration, accounting and financial procedure** that defines roles and responsibilities and specific control measures in relation to management of the accounts receivable (filing reports on sponsorship agreements with definition of the amount,

mechanisms and timeframes for invoicing and payment expiry dates, monthly issue of sales invoices, daily reconciliations, registration of the receivable flows on accounting software/applications), the accounts payable (reception of invoices through SDI (interchange system), formal checking of the invoice, checking the adequacy of the invoice and verifying supporting documentation, recording invoices on the systems, management of anomalies through the request for additional documentation, recording invoices payable in the payment schedules, creation of payment orders through home banking, payment authorisations by parties with the signatory powers), the management of treasury activities (daily reconciliation of incoming and outgoing financial flows, expenses incurred and reinstatement of petty cash) and providing for specific information flows when reporting to the Company.

- **Purchasing procedure** that defines roles and responsibilities, and specific measures of control relating to the definition and selection of suppliers (in accordance with the type/value of the procurement), approval procedures and provision for the specific 231 clause in the contracts.
- **HR procedure** that defines roles and responsibilities and specific control measures, with special reference to the selection and hiring mechanisms for staff and the selection of business partners, the evaluation of the resources and business partners selected, the authorisation to hire staff and the types of contracts, and with respect to the administrative management of staff.
- **Marketing and communication procedure** that defines roles and responsibilities and specific measures of control with particular reference to the activities of due diligence on the company requesting/benefitting from the sponsorship, the declarations on situations of potential conflict of interest by the sponsoring partners, the definition of price lists linked to sponsorships, the evaluation of sponsorship proposals by Management.

5.7 The criminal offence of incitement to make false statements to the legal authorities

(article 25-decies Legislative Decree 231/2001)

Law 116/2009 introduced article 25-decies into Legislative Decree 231/2001, providing for the extension to Companies, if the conditions apply, of liability for the criminal offence of incitement to not make statements or to make false statements to the legal authorities (article 377-bis of the Criminal Code). This category of criminal offence includes, for example, the hypothesis in which the Company incites, using any means, an employee to make untruthful statements to the legal authorities.

Exposure to the risk

The results of the risk analysis led to the identification of the following company processes in which You Energy Volley is more exposed to the risk of committing the criminal offences governed by article 25-decies of Legislative Decree 231/2001:

Governance	<ul style="list-style-type: none"> ▪ Organisation and assignment of powers ▪ Management of conflicts of interest
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Prevention measures

With regard to the activities and controls implemented to prevent the criminal offence governed by article 25-decies, the system of internal controls is described by the following company documentation:

- **Code of Ethics:** which expressly prohibits all types of corruption or bribery, unlawful favours, collusive behaviour, direct and/or indirect requests for personal advantages, referring to compliance with the principles of honesty, integrity and fair dealing and also defining specific principles of behaviour with respect to relations with the public authorities.
- **Powers of attorney and delegations of authority system** which defines the authorisation and control powers, assigning them in accordance with working practices, expressly providing what parties have the power to interact with the public authorities or public servants in the name of and on behalf of the Company.

5.8 Employment of illegally staying third country nationals (article 25-duodecies Legislative Decree 231/2001) and xenophobia and racism (article 25-terdecies Legislative Decree 231/2001)

The issue of permits to stay constitutes a true integral effect of permitting foreigners to work legally, before which it is absolutely not possible to establish lawful relations (otherwise the criminal offence in question would occur). This is therefore identified in the prompt checking of the validity of the permit to stay of the legal asset protected by the law.

The party liable for the criminal offence is the employer. However, case law includes into the concept of employer any party who “employs, on a fixed-term or permanent basis, for the

payment of remuneration, one or more persons, with the duty of carrying out employment of any nature”.

The employment of a foreign citizen is an assumption underlying the criminal offence.

Law 161/2017 changed the Anti-mafia Code and additionally, amended article 25-duodecies, introducing the criminal offence of transporting illegal foreigners into the territory of the state and that of favouring the stay of illegal foreigners in the territory of the state. Both criminal offences also provide for the application of prohibitory penalties pursuant to article 9, paragraph 2, Legislative Decree 231/2001 for a period of not less than one year.

Another recent new law, from 2017, was the introduction, pursuant to European Law 2017, of article 25-terdecies that aims to punish the promotion or instigation and incitement, committed in a way that causes a real danger of dissemination, based in whole or in part on the denial, the serious minimisation or the defence of the Shoah or genocide crimes, crimes against humanity and war criminals, as defined by articles 6, 7 and 8 of the Statute of the International Criminal Court, ratified in accordance with law no. 232 of 12 July 1999.

Exposure to the risk

The activity which could theoretically result in the criminal offence referred to by article 25-duodecies of Legislative Decree 231/2001 is represented by encouraging clandestine immigration through, for example, the failure to check the possession of a permit to stay or through irregularities (or similar actions) when making players members.

With reference to the crimes of xenophobia and racism provided for under article 25-terdecies, this could include the case of the intentional omission to carry out controls and reports of contents published, and the resulting failure to remove them, aimed at facilitating activities of incitement to discriminate or become violent for racial, ethnic or religious reasons exercised by groups, organisations or associations of fans.

The processes exposed to the risk of committing the criminal offences in question are:

Technical-sporting management (article 25-duodecies)	<ul style="list-style-type: none"> ▪ Selection and membership of players and technical staff
Social media (article 25-terdecies)	<ul style="list-style-type: none"> ▪ Social media management (Instagram, Facebook, Twitter, LinkedIn, YouTube, website, apps)

Prevention measures

With regard to the activities and controls implemented in order to prevent the criminal offence of employment of illegally staying third-country nationals and the criminal offence of xenophobia and racism, the Company adopted the following prevention and control measures:

- **Code of Ethics** which illustrates the guiding principles of the Company in the management of the membership relationships and relations with the fans. The Company undertakes to encourage loyal, responsible fans, and to oppose any behaviour that, directly or indirectly, involves offence, denigration for reasons of race, colour, religion, language, sex, nationality, origin, or that could be construed as ideological propaganda prohibited by the law or in any case, praising discriminatory behaviour or incitement to violence or xenophobia.
- **Powers of attorney and delegations of authority system** which defines the authorisation and control powers, assigning them in accordance with working practices
- **Internal membership rules:** which define the rules of fair play and prohibits any form of racial, territorial or religious discrimination, rules of behaviour on the use of social media and apps by the players (for example prohibition on publishing political or racially motivated posts), checking the content and images of the “banners” of the fans during games and checking offensive comments by fans on social media, checking the contents (for example images, videos, texts) published by the players on their social media profiles.

5.9 Criminal offences of fraud in sports competitions and abuse of gambling and betting activities (article 25-quaterdecies Legislative Decree 231/2001)

Law no. 39 of 3 May 2019 ratified and implemented the “Council of Europe Convention on the manipulation of sports competitions, Magglingen, 18 September 2014”. More specifically, the crime governed by article 1, Law 401/1989 (Sports Fraud) incriminates “Anyone who offers or promises money or other benefits or advantages to any of the participants in a sports competition organised by recognised federations in order to achieve a different result to that resulting from the correct and faithful performance of the competition, or carries out other fraudulent actions for the same purpose” and “participants in competitions that accept money or other benefits or advantages or accepts promises” while article 4 provides for different cases connected to the exercise, organisation, sale of gambling and betting activities in breach of authorisations or administrative concessions.

The provision extends liability to Entities for the criminal offences of “Fraud in sports competitions” and “Abuse of gambling and betting activities” introducing article 25-quaterdecies into Legislative Decree 231/2001.

As confirmed and consolidated by recent case law, the criminal offence may entail the promise, offer or request to carry out fraudulent behaviour aimed at the use/administration of prohibited/doping substances/drugs in order to alter the proper and fair performance of the sports event. This criminal offence also includes the intentional omission to give notice or wrong notification of the indication or and/or use/administration of prohibited/banned/doping substances/drugs.

Exposure to the risk

The activities in which scope the criminal offences could theoretically fall under as referred to by article 25-quaterdecies Legislative Decree 231/2001 are represented by the acquisition of prohibited/banned/doping substances/supplements/medicines in order to alter the proper and fair performance of the sports event and the improper management of the qualification and selection process of the supplier in order to facilitate the acquisition of the above-mentioned products.

This criminal offence included in article 25-quaterdecies can also be found in medical-sporting management activities, for example through the intentional failure to or mistaken notification of the indication of and/or use/administration of prohibited/banned/doping substances/drugs.

Another example of the criminal offence is given by the commission of fraudulent actions aimed at altering the rules of a fair competition through, for example, the promise to acquire/sell/lend players at economic conditions that are excessively or unreasonably favourable to one of the parties.

The processes exposed to the risk of committing the criminal offences in question are:

Governance	<ul style="list-style-type: none"> ▪ Organisation and assignment of powers ▪ Management of conflicts of interest
Procurement	<ul style="list-style-type: none"> ▪ Procurement management ▪ Definition and selection of suppliers
Sporting-technical management	<ul style="list-style-type: none"> ▪ Medical-sporting management ▪ Selection and membership of players and technical staff ▪ Management of relations with the players

Prevention measures

With regard to the activities and controls implemented in order to prevent the criminal offences of sporting fraud, the Company adopted the following prevention and control measures:

- **Code of Ethics** which defines the rules of fair play, providing for implementation of the FIPAV policies and the addition to the staff of all the figures provided for by prevailing regulatory sources. The Code of Ethics defines the proper rules of behaviour that players and sporting staff have to comply with, providing
 - a prohibition on holding, consuming, offering or giving, for whatever reason, alcoholic substances, drugs or substances with similar effects during the working/sporting performance
 - prohibition on the use of any substance that goes against anti-doping laws
 - prohibition for the medial-sporting staff to advise, prescribe or administer pharmacological treatments aimed at altering the performance of the players and the obligation to immediately report this if they become aware of it
 - prohibition on carrying out or just facilitating, directly or through third parties, bets that relate to the results of the official competitions in which the Company takes part.
- **Powers of attorney and delegations of authority system** which defines the authorisation and control powers, assigning them in accordance with working practices.
- **Purchasing procedure** that defines roles and responsibilities, and specific measures of control relating to the checks on purchasing requirements and issue of purchasing requests, definition and selection of suppliers (in accordance with the type/value of the procurement), approval procedures, management of the purchase, provision for the specific 231 clause, checking the procured goods/services.
- **Internal members rules:** that define the rules of fair play that players and sporting staff have to comply with, with specific reference to the prohibition on consuming alcoholic beverages or drugs and the prohibition on sports bets. Special attention is given to the fight against doping, in accordance with national and international law, regulations and standards (World Anti-Doping Agency) including anti-doping sports regulations issued by CONI and the additional regulations issued by FIPAV.

5.10 Tax crimes (article 25-quinquiesdecies Legislative Decree 231/2001)

The reform law of the tax crimes Law no. 157 of 19 December 2019, conversion law of Decree Law

no. 124 of 26 October 2019 (known as the tax decree), extended the responsibility of entities to tax crimes, adding article 25-quinquiesdecies into Legislative Decree 231/2001. Reference is made to the following cases: fraudulent tax returns by the use of invoices or other documents for non-existent transactions or other stratagems; the issue of invoices or other documents for non-existent transactions; hiding or destroying accounting documents; fraudulent failure to pay taxes due.

The category of tax crimes was further expanded by the implementing Decree of the PIF Directive (Legislative Decree no. 75/2020) which introduced the following criminal offences into article 25 quinquiesdecies: false tax returns, failure to make a return, undue settlement where they refer to cross-border fraud and in order to evade value added taxes for a total amount of not less than ten million euros.

Exposure to the risk

The results of the risk analysis led to the identification of the following company processes in which You Energy Volley is more exposed to the risk of committing the criminal offences governed by article 25-quinquiesdecies of Legislative Decree 231/2001:

Governance	<ul style="list-style-type: none"> ▪ Organisation and assignment of powers ▪ Management of conflicts of interest
Administration and accounting	<ul style="list-style-type: none"> ▪ Accounts receivable ▪ Accounts payable ▪ Treasury ▪ Preparation of financial statements and management of tax charges

Prevention measures

With regard to the activities and controls implemented in order to prevent tax crimes, the Company adopted the following prevention and control measures:

- **Code of Ethics:** which illustrates the guiding principles of the Company recommending the veracity, completeness, accuracy and precision of the accounting data and information.
- **Powers of attorney and delegations of authority system** which defines the authorisation and control powers, assigning them in accordance with working practices.

- **Administration, accounting and finance procedure** that defines roles and responsibilities and specific control measures in relation to the management of the accounts receivable and payable and management of the treasury activities (as set out in the paragraphs above), and provides for specific information flows on the reports given to the Company, aimed at preventing the use of invoices or other documents for non-existent transactions, and specific control measures relating to the preparation of the financial statements and the management of tax charges.

5.11 Other criminal offences

The analyses carried out showed that the Company has marginal exposure, if not purely theoretical, to the following predicate offences:

- Article 24-bis: *ICT criminal offences (which activity is carried out on an outsourced basis only)*
- Article 25-bis: *forgery of money, public credit instruments, revenue stamps and distinctive signs and instruments;*
- Article 25-bis 1: *offences against industry and commerce;*
- Article 25-quater: *crimes committed for the purpose of terrorism or subversion of the democratic order;*
- Article 25-quater 1: *female genital mutilation;*
- Article 25-quinquies: *offences against the individual person;*
- Article 25-sexies: *market abuse;*
- Article 25-novies: *offences relating to copyright infringement;*
- Article 25-undecies: *environmental crimes;*
- Article 25 sexiesdecies: *smuggling.*
- *Transnational crimes.*

Since the Company is not significantly exposed to said criminal offences, no additional controls are implemented beyond those provided for under the Code of Ethics, internal documents and the procedures adopted.

6. SUPERVISORY BOARD

6.1 Introduction

Under article 6, the Legislative Decree requires, as among the conditions needed for the Entity to avoid having to answer to any predicate offences committed in it, the need to entrust a Body of the entity, with independent powers of initiative and control, with the task of monitoring the functioning and compliance of the organisation and control model set up, and ensuring its update¹.

In accordance with that provision, the Company has a Supervisory Board, of a monocratic nature, and appointed directly by the Sole Director.

The performance of its duties by the Supervisory Board constitutes an essential element for the exemption provided for under the Decree.

6.2 Appointment and composition

The Supervisory Board is monocratic, with the member chosen from among persons who are qualified and equipped with a high level of professionalism and in possession of the requirements of integrity as referred to by article 4, Decree no. 516 of 30 December 1998.

The Supervisory Board is appointed by the Sole Director by decision in which the duties and powers are indicated, along with the duration of the appointment and the remuneration due, and the budget assigned to the Supervisory Board.

The appointment decision shall be promptly communicated through adequate means of communication.

6.3 Duration in office, replacement and removal of the members of the Supervisory Board

In order to guarantee full autonomy and independence, the Supervisory Board will remain in office until removal and/or loss of office as established upon appointment by the Sole Director.

The loss of the subjective requirements of integrity shall result in the immediate loss of office. In the case of loss of office, death, resignation or removal, the Sole Director will promptly replace the outgoing member.

¹ From 1/1/2012, the job of monitoring the effectiveness of and the compliance with the models, and of overseeing their updates (function up till then entrusted to the Supervisory Board) may be carried out, in limited companies, also by the board of statutory auditors, the oversight board or the management control committee. As established by article 14, paragraph 12 of Law 183/2011 (2012 Stability Law) which introduced paragraph 4-bis to article 6 of Legislative Decree 231/01.

Any removal of the Supervisory Board may occur solely for just cause, by decision of the Sole Director, where “just cause” refers to serious negligence in the performance of the duties related to the appointment, including but not limited to:

- the failure to draw up the reports on the activities carried out to give to the Sole Director;
- failure to check the reports given to the Supervisory Board, regarding the commission or alleged commission of the criminal offences governed by the Decree, and the breach or alleged breach of the model or the procedures established to implement it;
- the failure to call or hold the Supervisory Board meetings during a half-year period;
- the failure to carry out the routine/ad hoc controls.

6.4 Requirements of the Supervisory Board

Autonomy and Independence

You Energy Volley is committed to guaranteeing full autonomy of initiative to the Supervisory Board and protecting it from all types of interference or conditioning. To that end, the following is provided for:

- the Board shall not have, possibly, direct operating duties, taking account of the level of exposure to the risk of criminal offence in the department in which it operates, and will not be able to interfere in Company operations;
- in the performance of its functions, the Board is not subject to hierarchical or disciplinary power of any company body or department;
- it reports solely to the Sole Director;
- the adoption of its decisions and the determination of its activities cannot be called into question.

Professional competence

In order to carry out its duties properly, it is essential that the Board guarantees adequate professional competence.

From this standpoint, the following are relevant:

- the knowledge of legal matters (especially the structure and mechanisms relating to committing the predicate offences and the Decree as a whole);
- an in-depth awareness of the organisational structure of the Company;
- adequate competence in auditing and control matters (analysis techniques and risk evaluation).

Integrity and absence of conflict of interests

This requirement should be understood as follows:

- the member of the Supervisory Board is chosen from among persons who are qualified and equipped with a high level of professional competence, and in possession of the requirements of integrity as referred to by article 4, Decree no. 516 of 30 December 1998.
- the Supervisory Board must refrain from getting involved in any situation that could give rise to a

real conflict of interest.

Continuity of action

The continuity of action by the Supervisory Board shall be guaranteed through the duration and opportunity to be removed from office for just cause as described above.

6.5 Resources of the Supervisory Board

The Sole Director shall assign the Supervisory Board the human and financial resources considered adequate to be able to carry out the tasks, and in any case suitable with respect to the size of the Company and the duties of the Supervisory Board in accordance with the level of exposure to risk.

With regard to the financial resources, the Board may set a budget, assigning it on an annual basis, also at the proposal of the Board itself.

With regard to the human resources, the Supervisory Board may avail of the staff assigned to it, external consultants and the assistance of all the Company's departments.

In the case of necessity, the Supervisory Board may ask the Sole Director, by written, reasoned communication, to assign it further human or financial resources.

6.6 Calling meetings

The Supervisory Board will meet each time it is considered appropriate: the Board will hold a

minimum number of three meetings per year. Specific minutes will be drawn up for every meeting, signed by everyone taking part.

6.7 Confidentiality obligations

The Supervisory Board must maintain confidentiality with regard to the news and information acquired in the exercise of its functions.

The Supervisory Board will ensure the confidentiality of the information that it comes into possession of, especially if relating to the reports that it should receive regarding alleged breaches of the model. Additionally, the Supervisory Board shall not look for or use confidential information for other purposes besides those under article 6, or in any case, for reasons that do not comply with the functions of the Supervisory Board, except in the case of express and informed authorisation.

All information held by the Supervisory Board will be treated in accordance with prevailing legislation in that area, and in particular, in accordance with the European Regulation for the protection of personal data (Regulation (EU) no. 679/2016) and whistleblowing laws (Law 179/2017).

The failure to comply with said obligations will imply the automatic loss of office as member of the Supervisory Board.

6.8 Duties and powers of the Supervisory Board

In accordance with the provisions of article 6, paragraph 1 of the Decree, which assigns the duty to supervise the functioning and compliance with the model, and to oversee its updating, the following tasks will be carried out by the Company Supervisory Board:

- check the adequacy of the model, or its ability to prevent the occurrence of unlawful behaviour, and to report any commission of it or attempts;
- monitor the effectiveness of the controls of the model;
- plan inspections and review the results of previous inspections;
- verify the activities or operations identified in the areas at risk (for example updating the procedures, system of delegation of authority in terms of consistency between powers assigned and activities carried out, awareness of the models);
- periodic meetings with the top management divisions of You Energy Volley and with the contact parties of the internal audit departments (accounts auditor) in order to compare, check and report on the progress of the organisation and management model
- promote meetings with the Sole Director each time it considers an examination or an action to be advisable to discuss matters relating to the functioning and effectiveness of the organisation and management model;

- check the effectiveness of the model, i.e., the correspondence between the actual behaviour and that formally required under the model itself;
- prepare an effective and efficient internal communication system in order to obtain reports of relevant information in accordance with the decree (reporting of any breaches and/or failure to comply with the model);
- carry out complete, timely, accurate, accessible and continuous training and information aimed at employees and business partners of the Company, especially promoting and defining the initiatives to spread awareness of the decree and the consequences resulting from its application (and management model, risk analyses, etc.);
- monitor the updating of the model:
 - evaluate, with cooperation of the relevant departments, the initiatives needed to update the model,
 - evaluate organisational/operational changes and legislative adjustments to prevailing laws, in terms of their impact on the organisation and management model,
 - propose to the Sole Director the amendments to the model made necessary by significant breaches of the provisions, by changes to the organisation, legislative actions that require the adjustment, or the actual commission of criminal offences,
- guarantee a flow of information towards the top management of the Company.

It should be specified that, with respect to updating the model, the adoption of any changes to it shall be the responsibility of the Sole Director, who has the direct responsibility for the adoption and effective implementation of the model.

The supervisory function is also extended to the Code of Ethics which will be monitored by the Supervisory Board.

In the performance of its duties, the Supervisory Board will always have to:

- record, including by drawing up and keeping specific reports, all the activities carried out and the measures adopted;
- record the reports and information received in order to ensure traceability of the actions;
- register and save all the documentation.

In order to perform the duties assigned to the Board, it will be given all the

powers needed to ensure effective, prompt monitoring, especially to:

- carry out, including without notice, all the inspections considered advisable;
- freely access the areas of all departments, files and documents of the Company;
- avail of, under its direct supervision and responsibility, help from all the Company facilities or from external consultants;
- directly make arrangements for the financial resources set aside for the purpose.

6.9 Management of the internal control system inspections

The Supervisory Board will ensure that each process of the Company at the risk of criminal offence is subject to inspection of the internal control system, with the regularity established by the Supervisory Board on the basis of the relevance and risks of the processes, and according to the results of the inspection reports from previous years. The Supervisory Board may also decide to carry out extraordinary inspections of the internal control system on the basis of specific reports, or for reasons linked to changes in the organisation or if the identification of critical issues makes it advisable.

The inspections may also be carried out by staff who are not part of the Supervisory Board provided they have skills similar to those required for the Supervisory Board.

The inspections on the internal control system shall be carried out on the basis of a programme drawn up by the Supervisory Board and agreed with the Sole Director. The programme will be drawn up in accordance with the state of importance of the activities subject to inspection.

The inspections of the internal control system will be carried out using instruments such as:

- interviews,
- examination of documentation,
- direct observation of the activities,
- feedback lists (if specific ones are needed for the process).

The results of the Supervisory Board activities shall be shared with the Sole Director through the annual report.

6.10 Reports and communications to the Supervisory Board

Reports (whistleblowing)

In accordance with the laws on whistleblowing and article 6, paragraph 2-bis Legislative Decree 231/2001, the Company recognises and protects the right of top management, and likewise, subordinates, to make reports of alleged unlawful behaviour or breaches of this organisation, management and control model that they become aware of due to their jobs.

The Company provides for confidential whistleblowing channels for reports of alleged breaches of professional behaviour and/or ethics principles referred to by prevailing internal and external prevailing laws and rules and/or unlawful or fraudulent behaviour that refers to employees, member of the company bodies, group companies and third parties (suppliers, consultants, business partners) which could directly or indirectly cause economic-equity damage and/or harm the image of the Company.

All employees, members of company bodies or third parties (suppliers, consultants, business partners) that have relations and business relations with the Company have the right to make detailed reports of alleged unlawful behaviour that is relevant to the 231/01 Decree and based on precise and agreed elements of fact or breach of the organisation, management and control model, making them to the Supervisory Board.

The reports can be submitted or sent by ordinary post to You Energy Volley S.S.D.R.L. (Via Tirotti, 54 - 29122 Piacenza) reserved to the attention of the Supervisory Board or alternatively, sending them via email to its email address Odv231@youenergyvolley.it.

The Company guarantees confidentiality and the anonymity of the reporting party in order to exclude the hypothetical risk of retaliation and/or discrimination against the party making the report.

With respect to the whistle-blower, no type of retaliation or discrimination is permitted that would have effects on the working conditions for reasons related to the complaint, with discriminatory measures being understood to be any unjustified disciplinary action, harassment at the workplace or any other form of retaliation that would make working conditions intolerable.

All types of abuse when making a report are equally prohibited such as the intent to defame or slander or libel, the improper use or intentional exploitation of the whistleblowing right. To that end, the Company reserves the right to pursue the wrongful use of the instrument (abuse of rights) imposing disciplinary sanctions in proportion to the severity of the case.

6.11 Flow of information to the Supervisory Board

In accordance with article 6, paragraph 2, letter d) of the Decree, there is an obligation to notify the Supervisory Board of situations of potential risk of unlawful action or actions that could be construed as breaches of the internal control system.

Action by the Supervisory Board

The Supervisory Board will examine all the reports that come to its attention, evaluate them and if it deems it necessary, will take action by initiating all the necessary in-depth examinations such as:

- calling the person responsible for the breach before it (or alleged breach);
- involving the departments of interest with respect to the report;
- accessing any source of information of the Company, document or figures considered relevant for the purposes of the analysis.

Other information

The entire Organisation (company bodies, managers and employees) will be obliged to notify the Supervisory Board of any information identified in the information flows provided for by the company procedures. The frequency of reporting may be broken down as follows:

- Event: any time the episode occurs, without undue delay;
- Supervisory Board meetings: the Board will notify, giving enough time beforehand, the company departments of its upcoming meetings so that they can prepare the information flows specified;
- Specific frequency, established on the basis of the potential criticality and the volumes linked to the report.

6.12 Reporting and document management

In order to guarantee its full autonomy and independence, the Supervisory Board will report directly to the Sole Director.

Each year, the Supervisory Board will draw up a written report for the Sole Director which must contain the following information at least:

- the supervisory activities carried out by the Board in the reference period;
- any criticalities that emerged both in terms of internal behaviour and in terms of the effectiveness of the model;

- the corrective and improvement actions planned and their level of progress;
- a summary of the reports received from internal and external parties, including what was directly found, regarding the alleged breaches of the provisions of this model, the prevention protocols and related implementation procedures, and the result of the consequent inspections carried out;
- any disciplinary provisions or sanctions applied by the Company, with reference to the breaches of the provisions of this model, the prevention protocols and related implementation procedures;
- the report of any changes in the regulatory framework and/or significant amendments of the internal organisation of the Company and/or the mechanisms used to carry out the business activities that require the model to be updated.

Supervisory Board meetings may be called at any time by the Sole Director to refer specific events to it or situations relating to the effectiveness and performance of the model; the Sole Director may also ask to be heard at any time if an examination or action by the Board is required regarding the adequacy of the model.

Minutes shall be taken of the meetings with the above-mentioned parties and bodies and copies of them will be kept by the Supervisory Board.

7. THE DISCIPLINARY SYSTEM

7.1 Purpose of the disciplinary system

You Energy Volley considers compliance with the model to be essential, and therefore, in accordance with articles 6, paragraph 2, letter e) and 7, paragraph 4, letter b) of Decree 231/01, adopted an adequate penalty system to apply in the event of the failure to comply with the rules set out under the model, since breach of said laws and measures, imposed by You Energy Volley in order to prevent the criminal offences provided for under Decree 231, would harm the relationship of trust established with the Company.

For the purpose of the application by You Energy Volley of the disciplinary sanctions provided for therein, the initiation of any criminal proceedings and their results are not necessary, since the laws and measures provided for in the model are adopted by the company on a fully autonomous basis, regardless of the criminal offence that any behaviour could cause.

Unlawful, illegal behaviour, or in any case behaviour that breaches the model may never be justified or considered less serious, even if carried out in the interest of or to the advantage of You Energy Volley. Any attempts and in particular, actions or omissions that are unequivocally aimed at breaching the rules and regulations established by You Energy Volley will also be sanctioned, even if the action has not been completed or the event does not occur for any reason.

In accordance with Law no. 179/2017 (the Whistleblowing law), the Company will also pursue the improper use and intentional manipulation of whistleblowing reports, applying the disciplinary system as provided for under the national collective contract for those cases. In accordance with the provisions of article 2 of Law 179/2017 “it is the duty of employers, in the event of disputes linked to the imposition of disciplinary sanctions, or demotions, dismissals, transfers or subjecting whistle-blowers to other organisational measures with direct or indirect negative effects on working conditions, after submission of the report, to show that said measures were based on reasons that are not connected with the report itself”

Abuse of the whistleblowing instrument by defamation or slander or libel will also be further pursued against the whistle-blower.

The Company will impose the most suitable disciplinary measures, taking account of the severity of the behaviour.

7.2 Sanctions against employees

In accordance with applicable legislation, You Energy Volley must inform its employees of the provisions, principles, and rules contained in the organisation, management and control model through the information and training activities described in the chapter below.

Breach by employees of the provisions, principles or rules contained in the model prepared by You Energy Volley to prevent the commission of criminal offences described under Decree 231 shall constitute a disciplinary offence, which can be punished in accordance with the procedures challenging the breaches and imposition of the consequent sanctions provided for under the applicable National Collective Labour Contract in accordance with what is set out and described in the section “Disciplinary measures” and in accordance with the provisions of article 7 of the Workers Statute, set out below.

The disciplinary system relating to the model was established in due respect for all labour related legal provisions. No different mechanisms or sanctions to those already codified and reported in the collective contracts and trade union agreements are provided for. The applicable National Collective Labour Contract provides for a variety of sanctions that can form, on the basis of the severity of the offence, the sanction to impose. Disciplinary offences relating to the activities identified as at risk of criminal offence include but are not limited to:

- the failure to comply with the principles contained in the Code of Ethics or behaviour that is not in any case compliant with the rules of the Code of Ethics;
- the failure to comply with laws, rules and procedures established under the model;
- the lack, incomplete or untruthful documentation or unsuitable storage of it needed to ensure the transparency and verification of the activities carried out in compliance with the procedural rules set out under the model;
- the breach or circumvention of the control system, carried out by the removal, destruction or alteration of the documentation provided for by the procedures mentioned above;
- the obstructing of controls and/or unjustified prevention of access to the information and documentation by the parties in charge of the controls, including the Supervisory Board.

The above-mentioned disciplinary offences may be punished, in accordance with the severity of the action, with the following measures:

- verbal warning;
- written warning;
- fine

- suspension
- dismissal.

The sanctions must be imposed by having regard to the severity of the offences: considering the extreme importance of the principles of transparency and traceability, and the relevance of the monitoring and control activities, the Company will be led to applying the provisions of greater impact against those offences which, by their very nature, infringe the principles on which this model is based. Similarly, for the purpose of giving an example, the management in total autonomy of an entire process that includes both the authorisation stage, and the accounting stage, which give rise to (or could give rise to) a risk from those listed in the special part of this model, could lead to, following completion of the disciplinary procedure, dismissal from the functions involved.

The type and extent of each of the sanctions must be applied by taking account of:

- the intent behind the behaviour or the degree of negligence, imprudence or inexperience, also with regard to the predictability of the event;
- the overall behaviour of the worker, with special regard to the existence or not of previous disciplinary actions against said worker, within the limits of the law;
- the worker's job;
- the position and level of responsibility and autonomy of the people involved in the facts constituting the offence;
- other specific circumstances relating to the disciplinary offence.

The Supervisory Board will have the responsibility to check and evaluate the suitability of the disciplinary system in light of Decree 231. The Supervisory Board must also promptly indicate, in its annual report, the possible areas for improvement and development of this disciplinary system, especially in light of applicable developments of the law.

7.3 Measures with respect to other intended users

Compliance by those who, in any capacity, operate in the name of and on behalf of You Energy Volley and by the rest of the intended users of the Code of Ethics rules and the model (with the model limited to the aspects applicable as the occasion arises) shall be guaranteed by the provision of specific contractual clauses regarding the applicable sanctions in the event of failure to comply with the Code of Ethics and the Model.

Any breach, or commission by these parties of the criminal offences provided for under Decree 231 will both be sanctioned in accordance with the provisions of the contracts entered into with them, and also through applicable legal actions to protect the Company. For example, these clauses may provide for the right to terminate the contract by You Energy Volley in the most serious cases, or the application of penalties for minor breaches.

7.4 Further measures

You Energy Volley will have the right to avail of all other remedies permitted by law, including the opportunity to request compensation for the damage resulting from breach of Decree 231 by the above-mentioned parties.

8. TRAINING AND COMMUNICATIONS

8.1 Personnel training

For the purposes of the validity of this model, You Energy Volley aims to guarantee the proper disclosure and knowledge of the rules of behaviour contained herein with respect to the resources already in the company and those who will join later, with different levels of detail in relation to the different levels of involvement by said resources in the activities at risk.

The information and communications system is supervised and integrated by the activities carried out in this area by the Supervisory Board, in cooperation with the managers of the company areas involved as the occasion arises in application of the model.

Initial Notification

Notification of this model is given to all the resources in the company at the time of its adoption by adequate forms of communication. Newly hired people will be given an information dossier in order to ensure they are made aware of the matters considered to be of primary relevance.

Training

The content and mechanisms of providing the training activities, aimed at spreading awareness of the law set out under Legislative Decree 231/2001, shall depend on the qualification of the intended users, the level of risk of the areas in which they work and whether they have to represent the Company or not. More specifically, You Energy Volley will provide different levels of information and training through disclosure instruments such as targeted training courses, email updates and internal information notes.

Information report and business partners and other third parties

Business partners and third parties with contracts who operate, in any capacity, on behalf of or in the interests of You Energy Volley, and those who are involved in carrying out relevant activities in accordance with the model, must be informed, for the sections of interest to them, of the contents of the model and the requirement by the Company that their behaviour complies with the provisions of Legislative Decree 231/2001.