



Better Silver S.p.a. has adopted, on November 6, 2024, the "231 Organization Model" pursuant to Legislative Decree 231/2001, in order to prevent crimes that could determine the liability of the Company, if the offences are committed in the interest or to the benefit of the same.

The 231 Organization Model is a dynamic system, that has impact on the business operation of the Company and requires continuous monitoring and updating to take into account feedbacks in its application, as well as developments in the relevant regulatory framework.

The 231 Model is composed of several sections, specifically: General Part, Special Part, Catalog of Offenses, Risk Analysis Tables, Dynamic Part, Code of Ethics, and Disciplinary Sanction System. Moreover, specific Operational Instructions have been drafted for the different risk areas, containing the various procedures that complete the Model and seamlessly integrate with the systems already adopted by the Company.

Along with the adoption of the 231 Model, Better Silver S.p.A. has appointed a collegial Supervisory Body, endowed with the necessary powers of action and expenditure, and composed of individuals possessing the requirements of professionalism and integrity, as well as independence and autonomy. They have also committed to ensuring the necessary continuity of action in the performance of their duties.

The Supervisory Body consists of Mr. Paolo Penzo, Mr. Stefano Cariolato, and Mr. Arturo Sullo.

For more information, visit: <https://www.bettersilver.it/wp-content/uploads/2025/03/1.-Indice-Modello-Organizzativo-Better-Silver-S.p.a.pdf>