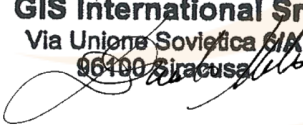


ORGANISATIONAL MODEL PURSUANT TO LEGISLATIVE DECREE 231/2001

GENERAL PART

Global Industrial Services
International S.r.l.
Rev. 7.0 – dated 27/05/2026

GIS International Srl
Via Unione Sovietica 6/A
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REVISION INDEX

Revision Index	Update Date	Description of Change	Prepared by	Approved by
0.0	01/12/2020	First issue	//	Administrative Body
1.0	06/04/2021	Revision Special Part G, Corporate Crimes	O.d.V.	Administrative Body
2.0	12/04/2021	Revision of risk matrix	O.d.V.	Administrative Body
3.0	21/03/2022	Reorganisation and revision of Special Part: Computer crimes and unlawful data processing, Crimes relating to non-cash payment instruments. Revision and reorganisation of risk matrix	O.d.V.	Administrative Body
4.0	31/05/2023	Revision Special Part: . Unlawful receipt of public grants . Crimes against cultural heritage Consequential revision of risk matrix	O.d.V.	Administrative Body
5.0	17/05/2024	Revision General Part: . 3.1 Whistleblowing: transposition of Legislative Decree no. 24 of 10/03/2023, ANAC guidelines pursuant to Resolution no. 311 of 12/07/2023 and Confindustria Guidelines of October 2023 Revision Special Part: . Fraudulent transfer of assets Consequential revision of risk matrix	O.d.V.	Administrative Body
6.0	28/05/2025	Revision Special Part: . C: Computer crimes and unlawful data processing Consequential revision of risk matrix	O.d.V.	Administrative Body
7.0	27/05/2026	Revision Special Part: . N: Crimes relating to copyright infringement . P: Environmental crimes . Q: Employment of third-country nationals with irregular stay . T: Crimes against animals Consequential revision of risk matrix	O.d.V.	Administrative Body

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THE COMPANY

Global Industrial Services International S.r.l. (hereinafter referred to as GIS or GIS International S.r.l. or the Company) has its registered office in Syracuse, at Via Unione Sovietica no. 6/A and was incorporated on 18 September 2000.

The shareholders are Nudo Ernesto with 60% and Nudo Aldo with 40%, with a share capital of €100,000 (one hundred thousand euros). The Company is managed by a Sole Director.

GIS International is a leading company in the province of Syracuse, with a strong presence throughout Italy, in the provision of services and solutions, including IT, in the field of accident prevention, safety, quality, health and environment (QHSE), with specific reference to the Oil&Gas and Energy industrial sector and more recently also towards Public Administration.

The high specialisation of the company team has led to the development of innovative and increasingly efficient management strategies to be applied in the field of industrial safety. For this reason, over the years a regular programme of modernisation of the offering has been undertaken, introducing new sections within the company framework and diversifying the sectors in which to operate.

Today GIS International is composed of the following business units:

- HSE consulting and safety engineering sector
- Software and IT application development
- Rope rescue and confined space operations
- Training as an accredited body with the Sicilian Region and DASOE
- Distributor of innovative gas detection devices and Personal Protective Equipment.

CHAPTER 1

MODEL 231

1.1. Foreword

Legislative Decree no. 231 of 8 June 2001 introduced new rules on the administrative liability of legal persons, companies and associations, including those without legal personality.

The profound innovation introduced by the legislator with Legislative Decree 231/2001 concerns the provision for an autonomous liability of the entity that is added to that of the natural person, the material author of the criminally relevant offence.

The administrative liability of the entity is provided for by Article 5 of Legislative Decree 231/2001, which establishes that the entity is liable in relation to offences committed in its interest or for its benefit by two different categories of persons:

- a) by persons holding functions of representation, administration or management of the entity or of one of its organisational units with financial and functional autonomy, as well as by persons who, even in practice, manage and control the entity (the so-called senior management);
- b) by persons subject to the direction or supervision of one of the persons indicated above.

The liability of the entity is excluded when the persons indicated at points a) and b) have acted exclusively in their own interest or in the interest of third parties.

The interest of the entity means the intention of the perpetrator of the offence to procure benefits for the entity through his/her conduct, while the benefit obtained by the entity is represented by the actual benefit.

From these considerations it emerges that the entity shall be liable both when those who committed the offence acted to benefit it, even if the entity did not derive any advantage from the unlawful act, and when it has objectively received a benefit, unless it is shown that the action of the natural person had an exclusively personal purpose and was therefore not in any way aimed at benefiting the legal person.

The criterion used by the legislator for attributing liability to the entity is therefore that of the fault of the legal person which has not adopted efficient and appropriate organisational and preventive measures to prevent the commission of the offence by the natural person.

Article 6 of Legislative Decree 231/2001 provides that the entity is exonerated from liability if all of the following conditions are met simultaneously:

- a) the governing body has adopted and effectively implemented, prior to the commission of the act, organisational and management models suitable to prevent offences of the type that occurred;
- b) the task of supervising the functioning and compliance with the models and updating them has been entrusted to a body of the entity with autonomous powers of initiative and control;
- c) the persons committed the offence by fraudulently circumventing the organisational and management models;
- d) there was no omission or insufficient supervision by the body referred to in point b).

In order to be exempt from liability, the entity must therefore demonstrate:

- I) that it has adopted and effectively implemented "Organisational, management and control Models" suitable to prevent the commission of criminal offences;
- II) that it has established a body with autonomous powers of initiative and control and that there was no omission or insufficient supervision on its part;
- III) that the perpetrators of the offence fraudulently circumvented the organisational and management models.

The presumption of liability of the entity, for the offence committed by a person in a senior management position (art. 5), can be overcome only by demonstrating the validity and effective implementation of the organisational model that has been prepared.

The supervisory body is primarily called upon to perform tasks of monitoring and verifying the adequacy of the model, analysis of the maintenance over time of the model's solidity and functionality requirements, and any updates that may prove necessary.

The offences provided for by Legislative Decree 231/2001 are numerous and are constantly updated. This means that the list of offences is growing ever longer. By way of example and not exhaustively, they include:

- Offences committed in dealings with the Public Administration
- Offences of forgery
- Corporate crimes
- Offences with the aim of terrorism or subversion
- Practices of female genital mutilation
- Crimes against individual personality
- Market abuse offences
- Transnational crimes
- Environmental crimes
- Offences relating to health and safety

The penalties provided for a company that commits one of these offences vary. They range from financial penalties that can exceed one million euros, to seizure of illegal profits, to sanctions prohibiting activity, or the prohibition on entering into contracts with the Public Administration, or to the suppression or revocation of authorisations, licences or concessions.

The further significant benefits deriving from becoming compliant with the 231 regulation are of an organisational/managerial nature (since the processes having a 231 impact are analysed and re-engineered / restructured / regulated) and of a rating recognised by private clients and the Public Administration (improvement of the "legality rating").

Whenever in this document reference is made to the Board of Statutory Auditors, or to control committees, or to Auditing Companies, such reference shall be understood as relevant only if such bodies have been appointed.

The rules relating to the extension and application of the model to subsidiary or affiliated companies shall be considered valid only with reference to entities existing at the time of actual application.

1.2. The Model 231 of GIS International S.r.l.

The Model 231 of the "Company" is divided into the following areas:

- 1) General Part
- 2) Code of Ethics
- 3) Sanctions Code
- 4) Supervisory Body Regulations
- 5) Special Part
 - a. Risk Analysis Model

And in the following chapters:

1. "Model 231";
2. "Risk analysis methodology" with a concise analysis of the methodology which is further developed in special part A) Risk Analysis and in the consequent Risk Analysis matrix;
3. "Supervisory Body", with the definition of the operating principles that is further developed in the dedicated document on the Supervisory Body regulations;
4. "Recipients and scope of Model 231", with the identification of the recipients of Model 231, the definition of the principles and rules for extending Model 231 to companies directly or indirectly controlled by the "Company" (hereinafter, "Subsidiaries") and the communication of the same to staff and the market, including the adoption of contractual clauses in dealings with third parties;
5. "Control measures", with the identification of general transparency standards;
6. "Rules for updating Model 231", with the provision of the programme for incorporating innovations in the event of legislative developments, significant changes to the organisational structure or the Company's areas of activity, significant violations of Model 231 and/or results of verifications of its effectiveness or sector public domain experience.

Regardless of the composition of the Model, the same shall in any case be understood, together with the annexes and internal procedures, as a single organic body of reference.

For the purposes of what is provided in this Model 231, the following constitute the so-called "General Principles of Model 231":

- (a) Model 231 (chapter 1);
- (b) Risk analysis methodology (chapter 2);
- (c) Supervisory Body (chapter 3);
- (d) Recipients and scope of the Model (chapter 4);
- (e) Control measures (chapter 5);
- (f) Rules for updating Model 231 (chapter 6);

Directly or indirectly controlled companies shall conform the content of their own organisational, management and control model to the General Principles of Model 231.

CHAPTER 2

RISK ANALYSIS METHODOLOGY

2.1. Risk analysis and internal control system

The identification of company activities in which there may be a risk of committing predicate offences for the liability of entities pursuant to Legislative Decree no. 231 of 2001 (hereinafter, the "Sensitive Activities") is carried out through the detailed analysis of company processes and the possible commission methods attributable to the predicate offences relevant to the Company.

For each Sensitive Activity, in addition to the person responsible for the individual company process ("Key Officer")¹, the existing operating and management methods and the existing control elements are identified. A comparative analysis is then carried out between the existing internal control system and the principles and content of Model 231 (in particular the control measures). Existing procedures will then be revised or new procedures will be qualified in line with what is defined within the quality system.

According to the document issued by the Committee of Sponsoring Organizations (CoSO) under the title Internal Control-Integrated Framework (CoSoIC-IF)², the internal control system can be defined as a set of mechanisms, procedures and instruments prepared by management to ensure the achievement of the objectives of operational efficiency, reliability of financial information, compliance with laws and regulations and safeguarding of company assets.

The components of the internal control system, based on the CoSO Report, Internal Control - Integrated Framework, are:

1) Control environment:

Reflects the attitudes and actions of "Top Management" with reference to internal control within the organisation. The control environment includes the following elements:

- integrity and ethical values;
- management philosophy and style;
- organisational structure;
- assignment of authority and responsibility;
- personnel policies and practices;
- personnel competencies.

2) Risk Assessment:

Definition of processes for identifying and managing the most significant risks that could compromise the achievement of company objectives.

3) Information and communication:

¹ The term "Key officer" refers to the subject who, based on the responsibilities assigned, is part of the process attributable to a Sensitive Activity and, in that capacity, has the best information useful for the purpose of evaluating the internal control system pertaining thereto, with particular reference to (i) the operational

management methods of the process and (ii) the internal rules and regulatory and organisational instruments that govern it.

² *Committee of Sponsoring Organizations of the Treadway Commission, internal control integrated framework, www.coso.org.*

Definition of an information system (IT system, reporting flow, system of indicators per process/activity) that allows both company management and operational staff to carry out their assigned tasks.

4) Control activities:

Definition of company regulations that ensure structured management of risks and company processes and enable the achievement of the set objectives.

5) Monitoring:

This is the process that verifies over time the quality and results of internal controls.

The aforementioned components of the internal control system are taken as a reference for the analysis of the risk of committing the offences provided for by Legislative Decree no. 231 of 2001.

In particular, the analytical activity is focused on:

- (i) identifying the Sensitive Activities in the Company in which the risk of committing the offences provided for by Legislative Decree no. 231 of 2001 may potentially arise and whose potential methods of commission have been preliminarily identified;
- (ii) detecting the control standards suitable to prevent their commission.

The objective of the activity is to ensure the maintenance and updating of the system for identifying, mapping and classifying company risk areas that are relevant also for the purposes of supervisory activities.

CHAPTER 3

THE SUPERVISORY BODY

3.1. Supervisory Body

In implementation of what is provided by Legislative Decree 231/2001 at art. 6, lett. b), it constitutes a necessary condition, for the granting of the exemption from administrative liability, that a Supervisory Body (or S.B.) with autonomous powers of initiative and control be entrusted with the task of supervising the functioning and compliance with the Model and of taking care of its updating.

The Supervisory Body governs its own functioning through its own specific regulations.

The autonomy and independence of the Supervisory Body are guaranteed by the recognition of its position within the context of the company organisational structure and by the necessary requirements of independence, probity and professionalism of its members, as well as by the reporting lines towards the top management assigned to it. The internal structures of GIS International S.r.l. ensure the performance of activities in favour of the Supervisory Body 231, in order to assist in the definition and performance of its competent activities and to enable maximum adherence to the requirements of professionalism and continuity of action and to the statutory duties.

In carrying out the assigned tasks, the Supervisory Body has unrestricted access to company information for its investigative, analytical and control activities. Any company function, employee and/or member of corporate bodies is obliged to provide information, in response to requests by the Supervisory Body, or upon the occurrence of events or circumstances relevant to the performance of the Supervisory Body's competent activities.

The Supervisory Body must be informed by those persons required to comply with Model 231 of events that could give rise to liability of the Company pursuant to Legislative Decree no. 231 of 2001. In any case all recipients of Model 231 are required to report possible illegitimate conduct relevant pursuant to Legislative Decree 231/2001 and intentional/fraudulent violations of Model 231, through the channels provided for the management of reports including anonymous ones (whistleblowing) in compliance with the specific company procedure/regulation on whistleblowing (in compliance with Legislative Decree no. 24 of 10 March 2023 following which art. no. 6 of Legislative Decree 231/2001 was also amended, ref. Paragraph 2-bis) or directly to the Supervisory Body by sending the report to the following email address of the S.B.: odv@gis-net.it. As the aforementioned company procedure/regulation on whistleblowing provides, reports concerning 231 predicate offences must be forwarded to the S.B. for its competent actions. Whistleblowers are guaranteed against any form of retaliation, discrimination or penalty and in any case the confidentiality of the identity of the whistleblower will be ensured, subject to legal obligations and the protection of the rights of the Company or persons erroneously or maliciously accused.

CHAPTER 4

RECIPIENTS AND SCOPE OF MODEL 231

4.1. Foreword

Wide dissemination is given, both within and outside the "Company" structure, of the principles and content of Model 231.

The supervisory body of the "Company" monitors the initiatives aimed at promoting communication and training on Model 231.

4.2. Recipients of Model 231

The principles and content of Model 231 are addressed to the members of corporate bodies, management and employees of the "Company", as well as to all those who operate in Italy and abroad for the achievement of the "Company's" objectives (hereinafter, the "Recipients").

4.3. Training and communication activities

Communication, information and training of staff are important requirements for implementing Model 231. The "Company" is committed to facilitating and promoting knowledge of Model 231 among management and employees, with a level of depth varying according to position and role, encouraging their active participation in deepening its principles and content.

4.3.1. Communication to members of corporate bodies

With the resolution that provides for the adoption of Model 231 (and its subsequent updates), each member of the deliberating corporate body also personally commits to compliance with the provisions contained therein. Directors who – even as a result of substitutions or renewals of positions – have not participated in the decision relating to the adoption of Model 231 (and its subsequent updates) sign a declaration of knowledge and adherence to its principles and content. The declaration is filed and kept by the Supervisory Body.

4.3.2. Training and communication to managers and unit heads

Model 231 is communicated to all managers (in role and/or in service in the Company) and Heads of organisational units.

The principles and content of Legislative Decree no. 231 of 2001 and Model 231 are also disseminated through training courses. Participation in the courses is compulsory. The structure of training courses is approved by the supervisory body of the "Company" on the proposal of the competent company functions.

4.3.3. Training and communication for office staff, employees and workers (non-unit heads)

Model 231 is posted on company notice boards and communicated to each employee. In addition, targeted training initiatives are defined for office staff, employees and workers (non-unit heads), while maintaining in any

case the obligation to participate in training initiatives relating to the Code of Ethics.

4.3.4. Training and communication through IT tools

Model 231 is made available to all employees on the company intranet (where available) and is also made available to all users – including non-employees – on the "Company's" website. Targeted training and information initiatives may also be carried out remotely and using IT resources.

4.4. Communication to third parties and the market

Consistent with what is already provided for the Code of Ethics, the principles and content of Model 231 are brought to the attention of all those with whom the "Company" has contractual relations. The commitment to observe the law and the reference principles of Model 231 on the part of third parties having contractual relations with the Company is provided for by a specific clause in the relevant contract and is the subject of acceptance by the third-party contractor.

In this regard, with a company regulatory instrument, clauses are standardised that, depending on the activity regulated by the contract, commit the counterparties to compliance with Model 231, also providing specific contractual remedies (such as the right of termination and/or the right to suspend the execution of the contract and/or penalty clauses) in the event of non-fulfilment.

4.5. Extension of Model 231 to Subsidiaries

The "Company" encourages the adoption and effective implementation by all Subsidiaries (where they exist) of their own organisational models.

The "Company's" Model 231 also represents the point of reference for the definition of the organisational model of each company directly or indirectly controlled by it. In particular, the Subsidiaries align themselves with the general activity transparency standards and the specific control standards of Model 231 adopted by the "Company". The possibility remains open for each Subsidiary to identify Sensitive Activities and specific control standards whose adoption is appropriate in light of the peculiarities of its own business reality and the relevant regulatory context.

Each Subsidiary establishes an autonomous and independent Supervisory Body.

Consistent with the approach described above:

- (i) Model 231 is communicated to each Subsidiary by the senior figure of the "Company" to which it reports from an organisational point of view;
- (ii) each subsidiary adopts and/or updates its own Model in compliance with what is specified above;
- (iii) the adoption of the subsidiary's own model and the relevant updates, in line with the methodology referred to in the preceding chapter 2 and this paragraph 4.5, is communicated for information by the administrative body of the subsidiary to the competent unit to which the subsidiary reports organisationally, according to the normal communication flows existing between the company and the competent structures of the "Company".

Without prejudice to the above, Subsidiaries issuing shares listed on regulated markets, if any, receive Model 231 and adopt their own model, adapting it – where necessary – to the peculiarities of their own company consistent with the degree of managerial autonomy that characterises them.

The representatives designated by the "Company" in the corporate bodies of investee companies, in consortia and in joint ventures promote the principles and content of Model 231 in their respective areas of competence.

The Supervisory Body of the "Company" monitors the process of adoption and updating of the organisational models of the Subsidiaries.

4.6. Simplified model for small-scale entities

Without prejudice to the non-derogability of the General Principles, with a specific internal regulatory instrument the cases are defined in which Subsidiaries of small dimensions³ may adopt a simplified model, characterised by the following elements:

- adaptation and rationalisation of the control standards of Model 231 to the individual company reality;
- at least annual verification, by the administrative body of the subsidiary, of the subsistence of the requirements that characterise the entity among those of small dimensions and legitimise the maintenance of the simplified model.

³ *In order to consider an entity/company to be "small-scale", it is necessary to examine the essentiality of the internal hierarchical and functional structure. The indicators of the characteristics of essentiality of the hierarchical and functional structure suitable – where two or more of them are found to be simultaneously present – for the qualification as a "small company" are: (a) the absence or reduced articulation of the structure of staff and external collaborators of the company; (b) the existence of significant outsourcing arrangements in the management of significant aspects of company activity; (c) the absence or reduced extent of operational activities; (d) the reduced articulation of the administrative and management bodies and the number of persons authorised to represent the company externally; (e) the limited dimensions of the company's turnover and financial flows.*

CHAPTER 5

CONTROL MEASURES

5.1. Structure of control measures

The controls aimed at preventing the risk of committing the offences provided for by Legislative Decree no. 231 of 2001 accompany compliance with the Code of Ethics, a non-derogable general principle of Model 231, and are structured on two levels of control:

- 1) general activity transparency standards, which must always be present in all Sensitive Activities considered by Model 231;
- 2) specific control standards, which provide for specific provisions aimed at governing the peculiar aspects of Sensitive Activities and which must be contained in the relevant company regulatory instruments. Such instruments include reference to Model 231 among the applicable regulations.

5.2. General transparency standards

The general transparency standards of Sensitive Activities pursuant to Model 231 are:

- a) Segregation of activities: segregation of activities must exist between those who execute, those who check and those who authorise⁴;
- b) Regulations: company provisions must exist that are suitable to provide at least general reference principles for the regulation of the sensitive activity;
- c) Signing powers and authorisation powers: formalised rules must exist for the exercise of signing powers and internal authorisation powers, also suitable to ensure that the attribution of the aforementioned powers occurs in line with the assigned organisational responsibilities;
- d) Traceability: the subjects, the functions involved and/or the IT systems used must ensure the identification and reconstruction of the sources, information elements and checks carried out that support the formation and implementation of the Company's decisions and the methods for managing financial resources.

The general transparency standards are incorporated by the competent functions within the internal regulatory instruments relating to Sensitive Activities. Such regulatory instruments are communicated and disseminated by the competent functions in compliance with applicable laws and contracts and bind the management and employees of the "Company" to their observance.

5.3. Sensitive Activities and specific control standards

The document "Sensitive Activities and specific control standards of Model 231" approved by the administrative body, on the occasion of the approval of the first version of Model 231 and on the occasion of its subsequent updates, provides for specific provisions aimed at governing the peculiar aspects of Sensitive Activities

⁴ *The following qualification is attributed to the standard: the principle of segregation must subsist by considering the Sensitive Activity in the context of the specific process to which it belongs; segregation exists in the presence of coded, complex and structured systems where the individual phases are coherently identified and governed in management, with consequent limitation of applicative discretion, as well as traced in the decisions taken.*

and the relevant controls adopted by the Company.

This document: (i) is kept at the Supervisory Body, (ii) is communicated by the Supervisory Body to the "Company". The specific control standards are incorporated by the competent functions in the internal regulatory instruments relating to Sensitive Activities. Sensitive Activities and specific control standards of the "Company" are communicated to the administrative/financial function for the performance of its competent control activities; the Supervisory Body of the "Company" also promotes their knowledge and dissemination to the relevant structures and bodies, including through internal regulatory instruments.

The instruments that make up the company regulatory system are communicated and disseminated by the competent company functions in compliance with applicable laws and contracts and bind the management and employees of the "Company" to their observance.

CHAPTER 6

RULES FOR UPDATING MODEL 231

6.1. Foreword

In view of the complexity of the Company's organisational structure, the updating of Model 231 is articulated in the preparation of an incorporation programme for innovations (hereinafter, the "Incorporation Programme").

6.2. Incorporation Programme

It becomes necessary to proceed with the preparation of the Incorporation Programme (i.e., the proposed amendments and/or additions to Model 231 and the document "Sensitive Activities and specific control standards of Model 231" with evidence of any improvement actions identified) on the occasion of: (a) legislative developments with reference to the rules on the liability of entities for administrative offences dependent on crime, (b) the periodic review of Model 231 also in relation to significant changes in the Company's organisational structure or areas of activity, (c) significant violations of Model 231 and/or results of verifications of its effectiveness or sector public domain experience.

The task of arranging the updating of Model 231 is assigned to the administrative body, already entrusted with its implementation. In this activity, the administrative body is supported by the company units responsible for Human Resources, Quality Health Safety and Environment, Administration and Finance, Internal Control. In particular – in line with the methodology and principles provided in Model 231 – these persons are assigned the function of:

- (i) acting without delay, upon notification from the Supervisory Body, to proceed with the revision/integration of Model 231;
- (ii) initiating and preparing, with the contribution of the competent company functions and in coordination with the Supervisory Body, the Incorporation Programme;
- (iii) monitoring the progress of any corrective actions that may prove necessary following the updating of the document "Sensitive Activities and specific control standards of Model 231".

6.3. Approval of updates to Model 231

The results of the Incorporation Programme are submitted to the administrative body of the "Company", which approves the results and actions to be taken within its remit. After approval by the administrative body:

- the amendments and/or additions contained in the Incorporation Programme that do not concern the "General Principles" of Model 231 or that relate only to the document "Sensitive Activities and specific control standards of Model 231" are immediately effective;
- updates to Model 231 that concern the General Principles are approved by resolution of the administrative body, with prior notification to the Board of Statutory Auditors, if appointed.

The Supervisory Body is responsible for keeping and disseminating to the competent company functions, at the conclusion of each update, the aforementioned document "Sensitive Activities and specific control standards of Model 231".

The Supervisory Body monitors the progress and results of the Incorporation Programme as well as the implementation of the actions taken.