

HILBE GROUP

CODE OF ETHICS

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1. FOREWORD

The Code of Ethics adopted by Hilbe Group (hereinafter also "the Group"):

- sets forth the set of ethical principles with which the rights, duties and responsibilities have to be complied in the relations within the Hilbe Group and in the relations with all persons with whom the companies of the Hilbe Group (hereinafter also "the Companies") enter into relations in the pursuit of their corporate purpose (customers, suppliers, employees and/or collaborators, shareholders, representatives of the institutions). These principles are aimed at regulating the conduct of the Addressees (as defined in point 2.2 of this document) of the principles themselves also in order to prevent the commission of offences, in breach of the applicable laws;
- sets reference ethical standards and rules of conduct to which corporate decision-making processes and the conduct of Hilbe Group companies and those working for them should be oriented;
- requires all persons to whom it is addressed to behave consistently, i.e. with actions that are not, even only in spirit, dissonant with the Group's ethical principles;
- constitutes an integral part of the system for the prevention of offences pursuant to Italian legislative decree no. 231/2001.

2. IMPLEMENTING MODALITIES

2.1 ADOPTION AND UPDATING

Adopted by resolution of the board of Directors of Hilbe S.p.a. on 26 January 2023 to replace the Code of Ethics of the subsidiary Pastore & Lombardi S.p.a. with one concerning the entire Hilbe Group (which currently includes Hilbe S.p.a. and Pastore & Lombardi S.p.a.), this Code of Ethics constitutes a document that may be subsequently amended and supplemented according to internal and external changes to the Group and its component companies, as well as to the experience acquired by them over time.

Any changes to this Code of Ethics are the sole responsibility of Hilbe S.p.a.'s board of Directors.

2.2 ADDRESSEES

This Code of Ethics is to be considered binding for the shareholders of the companies of the Hilbe Group, the members of corporate bodies, the managers and the employees of the companies themselves, as well as for all those who, although external to the companies of the Group, operate, directly or indirectly, in the name of and/or on behalf of the Companies (hereinafter, collectively, "the Addressees").

Addressees are therefore required to observe and, to the extent of their competence, enforce the principles contained in the Code of Ethics. Under no circumstances the claim to act in the best interests of the companies of the Hilbe Group justifies the adoption of any conduct contrary to that set forth herein.

The observance of the provisions of the Code of Ethics shall also be considered an essential part of the contractual obligations of any employees of the Hilbe Group companies pursuant to and in accordance with the provisions of articles 2104 et seq. of the Italian Civil Code.

3. PRINCIPLES AND VALUES

In addition to compliance with all applicable laws, the conduct of the Addressees in the performance of their duties and responsibilities or in their relations with the companies of the Hilbe Group must be characterised by the utmost integrity, honesty, fairness, transparency, confidentiality, fairness, objectivity, as well as respect for the individual and the responsible use of corporate, environmental and social assets and resources.

Everyone, within the scope of the responsibilities related to their role, must operate with the utmost professionalism to appropriately meet the needs of customers and internal users.

It is necessary that each person performs the assigned tasks with commitment, contributing concretely to the achievement of the corporate objectives and to the respect of the stated values.

The development of a sense of belonging to the Hilbe Group and the improvement of the image of the Group itself and the companies are common goals, which constantly influence the conduct of each individual.

In particular, the respect for the values of **integrity, honesty and fairness** implies, *inter alia*, that the companies of the Hilbe Group are committed to comply with internal rules and applicable laws and to demand the same behaviour from any employees, internal and external collaborators, customers, suppliers and any other third party with whom they have a legal relationship, whether formalised or not.

Compliance with the principles of **transparency** and **confidentiality** implies that the companies of the Hilbe Group are committed to disseminating truthful, complete, transparent and comprehensible information. This is to enable the Addressees to make informed decisions on the relations to be maintained with the companies themselves or in which they are involved, as well as to protect the confidentiality of the data and information - relating to the companies of the Group or to third parties - acquired by the employee and/or collaborator in the performance of their business activities.

Respect for the principles of **fairness** and **objectivity** means that Hilbe Group companies avoid any kind of abuse and ensures respect for all persons involved in business processes, with particular attention to the psychological and physical integrity and moral dignity of the individual. To this end, Hilbe Group companies protect and promote the value of any human resources.

Finally, the respect for the value of **responsibility** implies that the companies of the Hilbe Group carry out their business inspired by the principles of sound and prudent management, with the aim of being, within the limits set by market conditions, solid, reliable, transparent companies, open to innovations, open to the ever-changing needs of customers and proactive to their fulfilment, engaged to reach the best development and employment of human resources and the most efficient company organisation. This is aimed at protecting the reputation and assets of the company, at seeking compatibility between economic ambitions and environmental needs, not only in compliance with existing legislation, but also by following the best experiences and knowledge from in this field.

4. RULES OF CONDUCT

4.1 DEALING WITH PUBLIC ADMINISTRATION

For the purposes of this Code of Ethics, Public Administration means any State, local or supranational administration, as well as any public body, agency or independent administrative authority and its branches, and any physical or legal person acting as a public official or public service officer.

Also, according to this Code of Ethics, the definition of a public body includes all those legal persons, even if constituted in the form of the Italian civil code, whose public function is to safeguard general interests for overriding political and economic reasons.

The Hilbe Group companies establish and define communication channels with all public administration stakeholders (e.g. the Customs Authority, the Inland Revenue Agency, etc.).

In particular, the assumption of commitments vis-à-vis the Public Administration is reserved to the corporate functions appointed and authorised for that purpose, which are required to perform their duties with integrity, independence and fairness. Relations shall also be characterised by the utmost cooperation and, in any case, they shall not hinder the institutional activity of the Public Administration and preserving the proper scope of reciprocal independence, avoiding whatever action that may be conducted as an attempt to improperly influence the adoption of decisions.

With reference to relations with the Public Administration, it is forbidden for the Addressees of the Code to promise or offer to Public Officials or Entrusted of Public Service or, more in general, to Public Administration employees (hereinafter, collectively, "Public Officials") gifts (not only in the form of money, but also goods), benefits or other utilities (hereinafter, collectively, "gifts") to promote or favour the interests of Group companies when making commitments and/or handling relations of any kind with the Public Administration (for example, in the case of inspection or control activities or within the scope of judicial proceedings).

Specifically, it is prohibited to:

- offer gifts to the above-mentioned persons, also on festivities and anniversaries, except for gifts with symbolic value directly attributable to normal business courtesy relations and, in any case, such as not to create, in the other party or in an extraneous and impartial third party, the impression that they are aimed at making them acquire or grant undue advantages from the Company or such as not to create the impression of illegality or unethicity;

- examine or instrumentally propose employment opportunities for employees of the Public Administration (or relatives and relatives-in-law) and/or business opportunities of any other kind that might unduly benefit them;
- incur unjustified or non-contractually stipulated entertainment expenses, and with purposes other than the mere promotion of the corporate image;
- provide or promise to provide, solicit or obtain confidential information and/or documents or otherwise such as to compromise the integrity or reputation of one or both parties;
- favour suppliers and sub-suppliers in purchasing processes only because they are indicated by Public Officials as a condition for the subsequent performance of activities;
- knowingly produce false documents or documents containing false or altered data, subtract or omit documents, omit due information in order to unduly direct the Public Administration's decisions in one's own favour;
- engage in misleading conduct suitable to cause errors by the Public Administration in the technical-economic assessment of the products and services offered/supplied, or unduly influence the Public Administration's decision;
- use or submit false declarations or documents or certifying untrue things or omit due information, in order to obtain undue contributions, financing, subsidised loans or other disbursements of the same kind from the State, the European Communities or other public bodies (hereinafter, collectively, "public financing").

Grants, subsidies or subsidised public funding in favour of Group companies must not only be requested through application and possibly obtained in a licit manner, but must also be used solely for the performance of the activities or realisation of the initiatives for which they were granted.

When making both periodic communications and notifications and reports of a specific nature, Group companies guarantee the completeness and integrity of the information provided and the objectivity of the assessments, striving for timeliness in the fulfilment of the requirements.

Anyone receiving explicit or implicit requests or proposals for benefits of any kind from Public Officials or Public Service Officers shall immediately:

- suspend all relations with them;
- report the incident to their direct supervisor and inform in writing the supervisory body.

In relations with the Public Administration, Group companies shall not be represented by third parties when conflicts of interest may arise.

4.2 ADMINISTRATIVE, ACCOUNTING AND TAX MANAGEMENT

Every operation and transaction of each Group company must be correctly recorded, authorised, verifiable, legitimate, consistent and congruous. All operations of the Companies are to be

properly recorded and it must be possible to verify the decision-making process from the initial phase to the implementation phase. For each operation, the existence of adequate supporting documents, including computer files, is required so that it is possible to proceed, at any time, with checks that attest to the characteristics and motivations of the operation and identify the person who authorised, performed, recorded, verified the operation.

The Company's financial statements strictly comply with the general principles of a truthful and correct description of the patrimonial, economic and financial situation in compliance with the general and special rules in force. The inclusion in the financial statements of items based on valuations must result from unconditional compliance with statutory regulations and generally accepted standards.

Group companies fully comply with tax and contribution regulations, promoting all necessary measures to prevent unlawful activities and conduct and cooperating with the authorities responsible for verifying compliance with such rules.

4.3 CRIMES OF RECEIVING STOLEN GOODS, LAUNDERING AND SELF-LAUNDERING. USE OF CASH

Any national, transnational and extra-national operation that could even minimally involve, directly or indirectly, Hilbe Group companies in receiving, laundering and using money, goods and other benefits of unlawful origin is prohibited. In such perspective, available information on business counterparties and consultants must be checked in advance to ascertain their moral integrity, responsibility and the legitimacy of their activities before establishing business relations with them.

Group companies are also committed to preventing the crime of self-laundering and all other offences that constitute the predicate offence of money self-laundering.

Cash-free payments by means of appropriate money transfer means is generally preferable. The use of cash in money transfer transactions is only permitted for reasons of obvious convenience and for small amounts, never exceeding the limit set by law.

4.4 RELATIONS WITH COLLABORATORS AND PARTNERS

The Hilbe Group recognises the importance of the contribution that external Collaborators and industrial, commercial and financial Partners can make to the achievement of the social objectives of the companies, as well as the contribution that can be made to the image of the Hilbe Group.

Therefore, the selection of both external Collaborators and partners is subject to objective and transparent evaluations and is carried out on the basis of their professional, entrepreneurial and reputation reliability and the fact that they are only engaged in lawful activities and are guided by ethical principles similar to those of the Hilbe Group.

Relations with Collaborators and Partners are to be characterised by the utmost mutual fairness.

No services of any kind may be rendered in favour of Collaborators and Partners that are not adequately justified in the context of the relationship established with them.

4.5 CORPORATE ADMINISTRATION AND MANAGEMENT

Within the scope of their activities, the directors, auditors, shareholders, managers and all employees of the Group companies are required to comply with the principles of proper management to the extent of their competence and in accordance with the provisions of the law on so-called corporate offences. In particular, it is expressly prohibited in each Company:

- to prevent or hinder, through any conduct, the performance of control or auditing activities legally attributed to shareholders, other corporate bodies or the auditing firm;
- to engage in simulated or fraudulent conduct with the aim of determining the majority in a shareholders' meeting in order to procure an unjust profit for oneself or others;
- to disseminate false information or engage in any other artifice likely to cause a significant alteration in the price of unlisted financial instruments or for which no application for admission to trading on a regulated market has been made, or to have a significant effect on the confidence in the financial stability of banks or banking groups;
- to disclose untrue material facts about the economic, patrimonial or financial situation of Hilbe Group companies to public supervisory authorities, in legally required disclosures and in order to hinder the exercise of supervisory functions, or to conceal facts that should be disclosed by other fraudulent means. The functions of the aforementioned public supervisory authorities shall not be knowingly hindered, in any form whatsoever, including by omitting due communications;
- outside the cases permitted by law, it is prohibited to purchase or subscribe for shares or quotas of the company, including those issued by the parent company, causing damage to the integrity of the share capital or reserves that cannot be distributed by law;
- to carry out reductions in share capital, mergers or demergers, causing damage to creditors in breach of the legal provisions protecting creditors;
- to distribute profits or advances on profits not actually earned or allocated by law to reserves, or to distribute reserves, even if not established with profits, which may not be distributed by law;
- outside the cases of lawful reduction of the share capital, to return, even in a simulated manner, contributions to shareholders or to release them from their obligation to make them;
- to distribute profits or advances on profits not actually earned or allocated by law to reserves, or to distribute reserves, even if not established with profits, which may not be distributed by law;
- to fictitiously form or increase the share capital by allocating corporate shares or quotas for a sum lower than their nominal value, reciprocal subscription of shares or quotas, significant overvaluation of contributions in kind or receivables, or of company assets in the case of conversion.

4.6 GRANTS AND SPONSORSHIPS

The companies of the Hilbe Group may accept requests for contributions only in respect of proposals received from organisations and associations that are avowedly non-profit organisations with regular articles of association and deeds of incorporation, that are of high cultural or charitable value and that, in any case, involve a significant number of citizens.

Sponsorship activities may relate to social, environmental, sporting, artistic and entertainment aspects. These activities are only intended for events that offer a guarantee of quality or for which the Group can collaborate in the planning stage, so as to ensure originality and effectiveness.

4.7 INDIVIDUAL INTEGRITY AND DIGNITY

The Hilbe Group considers respect for the integrity and dignity of every human being a primary value to be protected with the utmost determination.

Therefore, it undertakes to protect the moral integrity of employees and collaborators and to avoid any discriminatory act against any of them, guaranteeing the right to working conditions that respect the dignity of the person and the laws on the employment of labour. In particular, it unreservedly condemns the exploitation, in whatever form, of the labour of persons in a state of need and/or subjection, and/or the sexual exploitation of minors.

It is strictly forbidden for any employee and collaborator to engage in any behaviour that can be construed as sexual or moral harassment, psychological violence, mobbing and straining (1).

4.8 RELATIONS WITH POLITICAL AND TRADE UNION ACTORS

Relations with representatives of political and trade union organisations are reserved for the competent functions of Hilbe Group companies authorised to do so.

The participation, in a personal capacity, of the Addressees in political organisations shall take place outside the working hours and without any connection to the function performed in the relevant Group company.

The companies of the Hilbe Group do not support events or initiatives that have an exclusively political purpose. They also refrain from any direct or indirect pressure on political figures and do not provide for the possibility of direct or indirect cash contributions,

(1) According to case law, straining consists in one or a few hostile actions that produce lasting negative effects on a person in a position of inferiority.

in kind, or in any other form to political parties, movements, committees and political and trade union organisations, nor to their representatives or associations with which a conflict of interest may arise.

4.9 ORGANISED CRIME, SUBVERSION AND TERRORISM

The Hilbe Group recognises the primary value of the principles of democratic order and free political determination informing the State. It carries out its activities by refraining from establishing relations of any kind with persons of dubious honesty or whose relations with mafia or criminal associations in general is proven or suspected. It is also completely unrelated to any conduct that may constitute or be in any way connected with terrorist activities or subversion of the democratic order of the State.

4.10 RELATIONS WITH THE JUDICIAL AUTHORITY

The Hilbe Group respects the Judicial Authority and the function it performs and, in relation to any proceedings in which a company of the Group is involved, requires that the Addressees behave correctly and fully cooperatively towards the Authority, within the scope of their activity for the company itself, condemning any attempt to make or induce it to make false or reticent statements.

4.11 USE OF IT AND TELEMATIC SYSTEMS

Addressees shall use the IT system of Hilbe Group companies for business purposes only.

The Hilbe Group condemns any unlawful IT and telecommunication conduct carried out in one's own interest or to one's own advantage. In particular, it requires Addressees to avoid, in the context of their activities for Group companies:

- unauthorised access to IT and telematic systems
- unlawful interception, obstruction or interruption of computer or telematic communications
- damage to information, data and computer programs, especially if they are used by the State or other public body or otherwise of public utility
- unauthorised possession and distribution of system access codes
- damage to or interruption of a IT or telecommunications system
- forgery of a public or evidentiary computer document and computer fraud in the certification of electronic signatures.

4.12 HEALTH AND SAFETY AT WORK

The companies of the Hilbe Group carry out their activities with particular attention to the health and safety at work of its personnel and third parties operating under its responsibility in this area, strictly observing the applicable regulations and adapting promptly to changes therein.

The responsibility of each Addressee towards their co-workers and colleagues requires the utmost care in preventing accident risks. Each Addressee must therefore take the utmost care in carrying out their activities, strictly observing all established safety and prevention measures, in order to avoid any possible risk to themselves, colleagues and third parties.

In particular, the Addressees are required to comply with the instructions and directives dictated by the persons to whom the Group's reference company has delegated the fulfilment of obligations concerning health and safety in the workplace.

4.13 ENVIRONMENTAL PROTECTION

The Hilbe Group recognises the environment as a primary asset to be safeguarded and plans its activities by seeking a balance between economic initiatives and the imperative need to protect the environment. Group companies are committed to operating in every situation by correctly applying the relevant national or EU legislation in force and, in any case, trying to limit the environmental impact of their activities.

4.14 CONFLICT OF INTEREST

In the conduct of any activity, situations in which the persons involved in the operations are in a conflict of interest, or in which the ability to operate in the total interest of the Group company and the Group itself is potentially affected, shall always be avoided.

In the performance of their duties, each Addressee is therefore obliged to disclose any conflicts of interest that concern them personally or with reference to persons related to them to the relevant Group company, refraining from taking part in activities in which such a conflict arises.

4.15 RELATIONS WITH PRIVATE BODIES

In relations with private bodies, in particular with other companies (customers, competitors, partners, etc.), Addressees must behave fairly and correctly in the context of maximum transparency, which absolutely excludes any corrupt intent.

If Addressees receive unlawful requests or proposals for benefits from representatives of other private bodies, they must immediately suspend the relationship and report the matter to the executive management of the relevant company and to the relevant supervisory body.

4.16 CONFIDENTIALITY AND PRIVACY PROTECTION

The Hilbe Group ensures the confidentiality of information in its possession concerning its employees, collaborators, customers, suppliers, shareholders and partners, without prejudice to legal and contractual obligations. In turn, the Addressees must use confidential information only for purposes related to the performance of their duties.

4.17 INTELLECTUAL PROPERTY AND COPYRIGHT

The Hilbe Group condemns the disturbance of the freedom of industry or trade, howsoever it occurs, as well as all possible forms of unlawful competition, fraud, counterfeiting or usurpation of industrial property rights, calling upon all those who work in the interest of a company of the Group to comply with the existing regulations on the protection of instruments or signs of authentication, certification or identification.

The Hilbe Group safeguards its intellectual property rights, including copyrights, patents, trademarks and identifying marks, by adhering to the policies and procedures provided for their protection and by respecting the intellectual property rights of others. It is therefore against company policies, to make, among other things, unauthorised reproductions of software programs, documentation or other copyrighted materials and to violate restrictions specified in licence agreements with computer program suppliers.

4.18 EMPLOYMENT OF WORKERS

Non-EU workers without a valid residence permit cannot be employed by a Hilbe Group company either directly in its own business or indirectly through external companies with which the company has entered into an agreement - however named
- of labour, contract work or supply.

5. IMPLEMENTATION METHODS

5.1 CODE OF ETHICS AND SUPERVISORY BODY

Control over the implementation of and compliance with this Code of Ethics is entrusted, limited to the principles and rules aimed at the prevention of offences on which liability may arise pursuant to Italian Legislative Decree no. 231/2001, to the appointed supervisory body pursuant to Articles 6 and 7 of Italian Legislative Decree no. 231/2001. In particular, the tasks of the supervisory body include:

- monitoring compliance with the Code of Ethics, with a view to progressively reducing the risk of offences provided for in Italian Legislative Decree no. 231/2001;
- monitoring and coordinating the updating and adaptation of the Code of Ethics, as well as making its own proposals in this respect, also with reference to regulatory innovations;

- promoting and monitoring initiatives aimed at fostering the communication and dissemination of the Code of Ethics to all Addressees;
- making its own observations on alleged violations of the Code of Ethics, reporting to the competent corporate bodies any infringements it has found or of which it has, in any case, become aware.

5.2 DISSEMINATION AND TRAINING ACTIVITIES

The Code of Ethics and its updates are brought to the attention of all Addressees through appropriate communication and dissemination activities.

In particular, each Group company shall provide its Addressees with a paper copy or transmit the file of the document and/or provide them with the necessary indications to access it in the intranet of the company IT system. The main contents of the Code of Ethics are also dealt with during the employee information and training sessions on the system for the prevention of offences pursuant to Italian Legislative Decree no. 231/2001. Each Group company may, however, resort to any other means which, also on the instructions of its supervisory body, is deemed suitable for the above purpose.

The relevant supervisory body is available to all Addressees to answer requests for explanations and to consider comments on the contents of the Code of Ethics.

5.3 REPORTING

Any Addressee of a Hilbe Group company who becomes aware of acts or conduct that may constitute a breach of this Code of Ethics must immediately report it to the company's supervisory body.

Furthermore, employees and third parties are obliged to report the Group company's supervisory body any instructions or pressures received from the company itself that conflict with this Code of Ethics.

Failure to comply with the obligation to report to the S.B. entails the possibility of sanction against the passive Addressee.

The supervisory body assesses the existence and relevance of the reported breaches and, if it finds that the conditions are met, notifies the Chairperson of the Board of Directors of the breaches and its assessments. In the case of violations that do not concern the principles and rules aimed at preventing the offences on which liability may arise pursuant to Italian Legislative Decree no. 231/2001, the supervisory body shall forward the reports directly to the Chairperson of the Company.

No retaliation, discrimination and/or penalisation may be applied by a Group company for reports that have been made in good faith, save for legal obligations and save for the protection of the rights of those falsely accused and/or accused in bad faith; sanctions are provided for against those who violate whistle-blower protection measures and those who maliciously or negligently make reports that turn out to be unfounded.

Following the implementation of Law 179/2017 ('whistleblowing'), the boards of directors of Group companies established an electronic channel through which reports of violations of the Code of Ethics can be made, and the respective supervisory bodies created an e-mail address to guarantee the confidentiality of the identity of the whistle-blower (wb-231@virgilio.it). Reports sent to this address must:

- not to be anonymous
- contain an indication of the company to which the report refers
- state in detail the violation of the Code of Ethics.

5.4 SANCTIONS

With regard to the typification of the violation of the provisions and principles of this Code of Ethics, as well as the relevant applicable sanctions, please refer to the provisions of the Disciplinary and Sanctioning System of the parent company Hilbe S.p.a., which is an integral part of the Organisational and Management Model pursuant to Italian Legislative Decree no. 231/2001 of the Company itself.

In summary, the Disciplinary and Sanctioning System provides for the following:

- in the case of Employees – included Executives and Managers - the disciplinary measures that can be imposed range from a written warning to dismissal for just cause;
- in relation to the members of the board of Directors, the measures applicable to them are a warning or, in the most serious cases, revocation of the mandate in accordance with the procedures laid down in the Italian Civil Code (in the case of Executives or Managers who are members of the board, the applicable sanctions are those laid down for the members of the board anyway);
- in relation to Statutory Auditors, the measures applicable to them are a warning or, in the most serious cases, their revocation consistently by the procedures set out by the Italian Civil Code;
- with regard to third-party Addressees, any non-compliance with the principles and rules contained in this Code of Ethics entails the imposition of a sanction consisting in a warning or, in serious cases or in case of reiteration, the termination of the contractual relationship;
- finally, a serious breach of the provisions contained in the Code of Ethics by one of the members or the sole member of the supervisory body of one of the companies of the Group entails the revocation of the member's mandate.

In accordance and in compliance with the provisions of the law and the collective labour agreement in force, the preceding shall not impair the right of each Group company to claim compensation for any damage caused to it by the perpetrator of the violation of the Code of Ethics.