

Tellure Rota S.p.A.

ORGANIZATION, MANAGEMENT, AND CONTROL MODEL

With resolution dated September 26th, 2025 the Board of Directors of Tellure Rota S.p.A. adopted the latest updated version of its Organization, Management, and Control Model pursuant to Italian Legislative Decree No. 231/2001, in order to ensure the proper management of its activities and to prevent the risk of committing relevant crimes.

Legislative Decree No. 231/2001 has introduced into the Italian legal system the regime of liability for entities concerning administrative offenses dependent on crimes. It establishes that companies can be held liable for various crimes committed or attempted in their interest or to their advantage, either by members of the company's top management or by individuals who are subject to their direction or supervision.

The Supervisory Body of Tellure Rota S.p.A., endowed with autonomous powers of initiative and control, is responsible for monitoring the implementation and compliance with the Model, as well as promoting its updates.