

QUESTIONNAIRE – Organizational, Management and Control Model

1. What does the Decree-Law 231/2001 introduce in our system?
 - The legal liability of a Company for crimes committed internally
 - The administrative liability of a Company for crimes committed, to gain advantages for the Company, by a component of the top management or by a subject acting under the supervision and control of the top management
 - An extension of the civil liability of the Company for damages caused by a manager or any other employee

2. What is the Organizational, management and Control Model (OCM)?
 - It is a document defining the responsibilities within the Company
 - It is an organizational chart associated to qualification profiles
 - It is the set of the organizational procedures which characterize the Company activities and the measures adopted to ensure its proper operation (preventing crime commission)

3. What is the Decree-Law 231/2001 aimed at?
 - Condemning any employee who disregards the Company Rules and Regulations
 - Allowing for manager dismissal
 - Preventing crime commission during the activities carried out on behalf of the Company

4. Who are the intended recipients of the Model?
 - The top management
 - The top management, the employees and the collaborators of the Company
 - The CEO (Chief Executing Officer) of the Company

5. Check which answer identifies the indictment criteria for the Company when a crime is committed while working on behalf of the Company
 - Having committed a crime which results in an advantage for the offender
 - Having unjustly dismissed an employee
 - Having acted in the interest or for the benefit of the Company

6. Check if the following statement is true or false:
“The lack of an organizational model oriented to the prevention of crimes is not an indictment criterion when the Company has adopted a stable and efficient organization, associated with an internal quality control system”
TRUE FALSE

7. When is the responsibility of a crime assigned exclusively to the offender?

- When the Company assets are not sufficient to cover the relevant fines
- When the offender acted by circumventing fraudulently the prescriptions of the OCM
- When the offender has not acted exclusively in its own or third parties interest

8. Check if the following statement is true or false:

The Ethical Code is the set of values of a Company and represents its mission, hence it is not an integral part of the OCM, which only refers to administrative procedures.

TRUE FALSE

9. Can the employees be exempted from the system described and contained in the OCM?

Yes, if they are not part of the top management No

10. When an employee is aware of actions or omissions not in line with prescriptions of law or of the OCM of the Company...

- He/She is not obliged to inform the Company
- He/She must notify the Company, even anonymously, through the Supervisory Board (Organismo di Vigilanza)
- He/She can decide on his/her own whether to inform the top management or not

11. The Supervisory Board (Organismo di Vigilanza):

- Is subject to directives of the top management, which define the actions required to properly monitor the application and the efficiency the OCM
- Is given independent authority to properly monitor the application and the efficiency of the OCM
- Is directly accountable to the judicial authority for topics related with Decree-Law 231/2001