

ADMINISTRATIVE RESPONSIBILITY FOR ENTERPRISES: ORGANIZATION, MANAGEMENT AND CONTROL MODEL PURSUANT THE ITALIAN LEGESLATIVE DECREE 231/01

Legislative Decree No. 231, June,8, 2001, introduced the regulation for the Companies' Administrative Responsibility according to which they can be held responsible, and consequently sanctioned, in relation to certain crimes committed or attempted in the interest or for the benefit of the Company by directors or employees. The Company's liability is excluded if it has adopted and effectively implemented, before the commission of crimes, a model of organization, management and control suitable to prevent the crimes themselves and it has established a Body responsible for supervising the effective application, operation and compliance with the model.

The model adopted by Genenta Science SpA ("The Company" or "Genenta") represents a framework of principles and the reference point for setting the organization and management model of each subsidiary (named "Genenta Organization and Management Model 231", the "Model").

The Model was approved for the first time on May 20, 2021 together with a document setting forth the main principles of ethics and conduct by which the Company is inspired and to which it must adhere in carrying out its business activities (the "Code of Ethics"): In the same date the Company approved the Supervisory Body ("Organismo di Vigilanza" or "ODV").

A team has been set up with the aim of identifying and developing the necessary activities to maintain and to update the Model, as well as to ensure the alignment between the Model, the organizational structure and the Corporate System Framework that identifies the Company business processes.

Genenta in accordance with the principle of continuous control system improvement and in the awareness of the importance of the Model 231 content dissemination - both inside and outside the Company - to ensure an effective application of the same, has developed a specific training program involving all the employees.

This training activity represents an important tool to raise management and staff awareness in order to better prevent crimes, and to promote a widespread adherence of all the employees to the Company's Code of Ethics.

The Supervisory Body, ODV, is composed of two external components, *as a good practice*, in order to guarantee transparency, independence and specialized professional skills so that the Body can effectively carry out the tasks assigned to it:

- **Carlo Lamberti**, born in Lecco (LC), on November 9th, 1965, tax code LMBCRL65S09E507U;
- **Riccardo Pontremoli**, born in Genova (GE), on March 2nd, 1968, tax code PNTRCR68C02D969X.