

ORGANIZATION, MANAGEMENT AND CONTROL MODEL

THE SENSES OF D. LGS. 231/2001
ZEN CARBURANTI SRL

1. INTRODUCTION

1.1 Purpose of the Model

This Model of Organization, Management and Control ("Model 231") is adopted by LA ZEN CARBURANTI SRL in accordance with the Legislative Decree of 8 June 2001, n. 231, for the prevention of crimes provided for by the Decree itself. The Model aims to promote a corporate culture based on integrity, transparency and accountability, ensuring an effective system of control over business activities.

1.2 Scope of application

This model applies to:

Members, directors and managers
Employees and collaborators
Suppliers, customers and business partners
All those who act on behalf of the company

2. ORGANISATIONAL STRUCTURE AND GOVERNANCE

2.1 Structure of the company

ZEN CARBURANTI SRL operates internationally in the marketing and distribution of petroleum products, including EN590 10PPM, Jet Fuel A1 and Gasoline 95. The company is organised with a governance system that ensures separation of functions and transparent management of activities.

2.2 Supervisory Body (OdV)

Pursuant to D. Lgs. 231/2001, the company establishes a Supervisory Body (OdV) with the functions of:
Monitoring the application of Model 231
Evaluation of the effectiveness and adequacy of the internal control system
Handling of reports of infringements

The OdV acts autonomously and independently, reporting directly to the administrative body.

3. RISK ANALYSIS AND CRIME PREVENTION

3.1 Risk Mapping

The company has identified risk areas related to its activities, with particular attention to:
Corporate offences (e.g. false social communications, hindrance to supervisory activity)
Offences against the public administration (e.g. corruption, bribery, undue inducement)
Environmental offences related to fuel management and distribution
Recycling and self-cycling
Workplace safety offences

3.2 Preventive measures

To reduce the risk of committing crimes, the Model provides for:
Codified business procedures for the management of risk activities
Training and awareness of staff on the principles of D. Lgs. 231/2001
Breach reporting system with confidentiality guarantee

4. CODE OF ETHICS AND DISCIPLINARY SYSTEM

4.1 Code of Ethics

The Code of Ethics of ZEN CARBURANTI SRL establishes the principles of:
Legality and compliance
Integrity and transparency in business operations
Environmental and social responsibility
Protection of competition and the market

4.2 Disciplinary system

The violation of Model 231 entails disciplinary sanctions, which may include:
Recall or suspension
Economic sanctions
Dismissal for just cause, in the most serious cases

CONTACTS

Legal and operational headquarters

ZEN CARBURANTI S.R.L.

Address: Via G.Bettiol n°15, Padova PD

Telephone: +39 328 123 8981 , Email: ceo@zencarburanti.com , VAT: 05689930286 , REA code: PD - 485342

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5. MODEL MONITORING AND UPDATING

5.1 Verification of effectiveness

The OdV periodically checks the effectiveness of the Model and proposes any updates based on the regulatory or organizational evolution of the company.

5.2 Updating the Model

Model 231 is updated in case of:

Significant regulatory changes

Organisational or corporate changes

Findings of the ODAs

6. WHISTLEBLOWER REPORTING AND PROTECTION

The company adopts a whistleblowing system that allows you to report in a confidential manner any violations of Model 231 or the Code of Ethics. Alerts can be sent via:

Dedicated e-mail address

Internal channel reserved

Counter OdV

The company guarantees maximum protection of the confidentiality of the reporting person, in accordance with current legislation.

7. CONCLUSIONS

By adopting this Model of Organization, Management and Control, ZEN CARBURANTI SRL confirms its commitment to the legality, transparency and business ethics, Ensuring an effective risk prevention system and promoting a culture of accountability and compliance within the organisation.

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