

Code of Ethics

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1 Section 1 - General introduction

1.1 Premise

This document, called the Code of Ethics, defines the set of rights and responsibilities that the company expressly assumes towards those with whom it interacts in carrying out its business.

The company believes in the value of work and considers legality, correctness and transparency of action to be essential prerequisites for achieving its economic, productive and social objectives.

The company affirms the congruity of its Code of Ethics in pursuing its mission.

The Code of Ethics considered as a whole and together with all the specific implementation procedures approved by the company (Quality Management System UNI EN ISO 9001: 2015, Occupational Health and Safety Management System UNI ISO 45001: 2018, Environmental Management System UNI EN ISO 14001: 2015, Gender Equality Management System UNI/PdR 125: 2022) is considered an integral part of the subordinate employment contracts in place and to be stipulated, pursuant to art. 2104 of the Italian Civil Code (Diligence of the worker).

Violation of its provisions will therefore constitute an offense of a disciplinary nature and, as such, will be prosecuted and sanctioned by the company pursuant to and for the purposes of Art. 7 (Disciplinary sanctions) of Law no. 300/1970 (Workers' Statute - Rules on the protection of the freedom and dignity of workers, freedom of association and trade union activity in the workplace and rules on placement) and may lead to compensation for damage caused to the organization.

As for collaborators, consultants and self-employed workers (specified below among the recipients) who provide their services on behalf of the company and other third parties, the signing of this Code of Ethics or an extract of it or, in any case, adherence to the provisions and principles set out there in represent a "*sine qua non*" of the stipulation of contracts of any nature between the company and such subjects. The provisions thus signed or, in any case, approved, even for conclusive facts, constitute an integral part of the contracts themselves.

In view on what has been described so far, any violations by the parties referred to in the previous paragraph of specific provisions of the Code of Ethics, based on their severity, may legitimize the company's withdrawal from the contractual relationships in place with such parties and they can also be identified "*ex ante*" as causes for automatic termination of the contract pursuant to Art. 1456 of the Italian Civil Code (express termination clause).

1.2 Recipients of the company's Code of Ethics

Through the adoption of the Code of Ethics, the company intended to define moral values, clear rules and procedures to comply with.

The Code of Ethics is aimed at:

- **Members of the collegiate bodies**
- **Employees (both temporary and permanent)**
- **Project collaborators**
- **External and internal consultants**
- **Suppliers of goods and services**
- **Any other person who can act in the name and on behalf of the company either directly or indirectly, permanently or temporarily or those who establish relationships or relations with the company and work to pursue its objectives**

The recipients of this Code of Ethics, which will be made available to them, are required to learn its contents and respect its precepts.

The company's management is responsible for the effective implementation of the Code of Ethics and its dissemination inside and outside the organization.

Company employees, in addition to the respect due to the regulations in force and the provisions established by collective bargaining, undertake to adapt the methods of carrying out their work activities to the purposes and provisions set out in this Code of Ethics.

This, both in intra-company relationships and in external parties' relationships, in particular, with the Public Administration and other public authorities.

An essential requirement of any relationship of profitable collaboration with the company is represented by the respect, by the other recipients, of the principles and provisions contained in this Code of Ethics.

In this sense, at the time of stipulating contracts or agreements with other recipients, the company provides them with a copy of this document.

2 Section 2 – Principles of behavior for the organization

2.1 Premise

The principles listed below are considered fundamental, therefore our organization is committed to respecting them towards everyone.

Furthermore, it is essential that these values do not remain mere statements but are translated into conduct and behaviour inherent to the company.

As an organization and as individuals, all recipients in the work environment are required to apply them correctly in both internal and external operations and relationships.

The fundamental values on which the company's activity is based are:

- **Integrity of behavior and compliance with Laws and Regulations.**
- **Repudiation of all discrimination.**
- **Centrality, development and enhancement of human resources and equity of authority.**
- **Territorial rooting.**
- **Transparency and business ethics.**
- **Quality.**
- **Diversity.**
- **Legality and fight against terrorism and crime.**

The company expects these values to define its identity and unite employees and collaborators to the organization.

2.2 Integrity of behavior and compliance with Laws and Regulations

The company undertakes to create and supply quality products and to compete on the market according to principles of fair and free competition and transparency, maintaining correct relationships with all public, governmental and administrative institutions, with citizens and with third-party companies.

Everyone is required to operate, in any situation, with integrity, transparency, coherence and fairness, conducting every business relationship with honesty.

The company operates in strict compliance with the Law and works to ensure that all staff act in this sense: people must behave in accordance with the Law, regardless of the context and activities carried out.

This commitment must also apply to consultants, suppliers, customers and anyone who has relationships with the organization.

The company will not begin or continue any relationship with anyone who does not intend to align with this principle.

2.3 Repudiation of all discrimination

In decisions that affect relations with interested parties (personnel management, work organization, selection and management of suppliers, relations with the surrounding community and with the institutions that represent it), our organization repudiates any discrimination based on age, sex, sexuality, state of health, race, nationality, political opinions and religious beliefs of the interlocutors.

2.4 Centrality, development and valorisation of human resources and equity of authority

The company recognizes the centrality of human resources and believes that an essential factor of success and development is the professional contribution of the people who work there.

The company has always placed the professionalism and individual contribution of people at the center of its operations, giving continuity to a relationship style that aims to recognize everyone's work as a fundamental element of corporate and personal development.

At the same time, the company favors dialogue, the exchange of information at any level, the development and professional development of its collaborators and the establishment of a corporate identity and the related sense of belonging.

This value translates:

- **In creating a work environment suitable for enhancing the contribution and potential of the individual through the gradual empowerment of staff.**
- **In the creation of a system of relationships that favors teamwork over hierarchical relationships.**
- **In the daily effort aimed at sharing skills and knowledge also through the use of innovative systems.**

The company attributes the utmost importance to those who work within its organization, contributing to its development, as it is precisely through human resources that the company is able to provide, develop, improve and guarantee a optimal management of its services.

Without prejudice to the legal and contractual provisions regarding workers' duties, employees are required to have professionalism, dedication to work, loyalty, a spirit of collaboration, mutual respect, a sense of belonging and morality.

In the management of contractual relationships which imply the establishment of hierarchical relationships, our company undertakes to ensure that authority is exercised with fairness and correctness and that any form of abuse is avoided: in particular the company guarantees that the authority does not transform into the exercise of power that is harmful to the dignity and autonomy of the person.

These values must in any case be safeguarded when making choices regarding the organization of work.

2.5 Territorial rooting

The company aims to carry out projects aimed at directly involving citizens, public and private institutions, entrepreneurs and associations in everything relating to health education, prevention and taking charge of their well being. The company takes action and will continue to take action to ensure that the companies collaborating with it comply with the same behavioral regulations and orient their activities towards the same principles and values.

The company also promotes local development through a strong connection with the various actors of the local community of reference.

2.6 Transparency and business ethic

The history, identity and values of the organization are expressed in a business ethic based on:

- **Reliability**
understood as a guarantee of absolute seriousness in the projects launched, in the transactions and in the commitments undertaken.

- **Solidity**

relating to an entity that rests on the defined capital bases, as demonstrated by its prolonged activity.

- **Transparency**

consequent to the conception of the social role which requires not only respect for ethical principles and values but also the implementation of methods that allow the communities of reference and social actors to have access to the information to be able to reconstruct their actions.

- **Correctness in contractual matters**

avoiding that, in existing relationships, anyone operating in the name and on behalf of the company tries to take advantage of contractual gaps or unforeseen events in order to renegotiate the contract for the sole purpose of exploiting the position of dependence or weakness in which the interlocutor has come to visit.

- **Protection of competition**

refraining from collusive, predatory and position-abusing behaviour.

2.7 Quality

Quality is a distinctive element of our company. The organization is committed to and responsible for ensuring quality in every activity, consistent with its long-term strategy. The activities are implemented by the company through a set of processes administered through a UNI EN ISO 9001: 2015 certified quality management system which offers external uniformity, transparency, improvement of the product and service.

2.8 Diversity

The company requires behavior from its directors, employees and collaborators that guarantees the utmost respect for the dignity of people, therefore the organisation:

- It guarantees the most scrupulous observance of the rules protecting child labor and workers' freedoms and rights.
- It guarantees the conditions of free membership of trade union organisations.
- Does not tolerate human rights violations.
- It promotes integration in the social fabric as a form of collective enrichment.

In particular, the company condemns any form of discrimination based on gender, ethnic, political and religious affiliation.

2.9 Legality and the fight against terrorism and crime

The company believes deeply in democratic values and condemns any activity that could have the aim of terrorism or subversion of the democratic order.

The organization also condemns any activity that involves:

- Forgery, counterfeiting, alteration and/or spending of coins, public credit cards and revenue stamps.
- Acceptance and processing of proceeds from criminal activities (money laundering).
- Illegal access to external IT systems.
- Illegal possession of access codes.
- Damage to equipment and data.
- Fraud in the management of electronic signature certification.

- Interceptions, impediments and interruptions of computer communications.
- Spread of ideas of tolerance and silence relating to the use of narcotic substances or which create any dependency.
- Incitement to carry out illicit acts or even those contrary to moral sense.
- Negligence in combating violence and damage to public property.

3 Section 3 – Social actors

3.1 Customers

The company's primary objective is to fully satisfy the needs of its customers.

In this framework, the organization ensures the customer the best execution of the assigned tasks and is constantly oriented towards proposing increasingly advanced and innovative solutions with a view to integration, effectiveness, efficiency and cost-effectiveness.

The company provides accurate, complete and truthful information in order to allow the customer to make a rational and informed decision. It protects the privacy of its customers in accordance with current regulations on the matter, undertaking not to communicate or disseminate the relevant personal data, without prejudice to legal obligations.

The company also adopts a communication style based on efficiency, collaboration and courtesy.

3.2 Financial institutions

The organization maintains relationships with financial institutions based on correctness and transparency, with a view to creating value for the company itself.

For this reason, financial institutions are chosen in relation to their reputation, also for their adherence to values comparable to those expressed in this Code of Ethics.

3.3 Providers

Suppliers of goods and services

The company defines collaborative relationships with its suppliers, in compliance with current regulations and the principles of this Code of Ethics, paying attention to the best professional standards, the best practices in ethical matters, health and safety protection and compliance with 'environment.

Internal and external consultants

The consultants are chosen in relation to their professionalism, reputation, reliability as well as adherence to values comparable to those expressed in this document.

Relationships with consultants are based on transparent agreements and constructive dialogue aimed at achieving common objectives, consistently with the regulations and principles of this Code of Ethics.

3.4 Public Administration

The term Public Administration means any person, entity, interlocutor who can be classified as a Public Official or Public Service Representative who operates on behalf of the central or peripheral Public Administration, or of Public Supervisory Authorities, Independent Authorities, Community Institutions as well as private concessionary partners of a public service.

In relations with the Public Administration, the company inspires and adapts its conduct to the principles of correctness and honesty. On this basis, the people appointed by the company to follow any negotiation, request or institutional relationship with the Italian or foreign Public Administration, must not for any reason try to improperly influence its decisions or engage in illicit conduct, such as offering money or other benefits, which may alter the impartiality of judgment of the representative of the Public Administration.

The people appointed by the company organization to manage relations with any authority of the Public Administration must verify that the information provided in any manner and for any reason is true, accurate and correct. The people who are allowed to have direct contact with the Public Administration on behalf of the company are the only people expressly indicated by the company itself for this purpose.

No other collaborator may have relations of any kind with the Public Administration for activities relating to the corporate purpose of the company.

When carrying out tenders, the persons appointed by the company must respect the law and the relevant regulations.

Work relationships with former Public Administration employees

The hiring of former employees of the Public Administration who, in the exercise of their functions, have had relationships with the company or their relatives and/or in-laws, takes place in strict compliance with the standard procedures defined by the organization for the selection of personnel.

The definition of other working and/or consultancy relationships with former employees of the Public Administration or with their relatives and/or in-laws also takes place in strict compliance with standard procedures.

Grants and financing

Contributions, grants or financing obtained from the European Union, the State or another Public Body, even if of modest value and/or amount, must be used for the purposes for which they were requested and granted.

The company prohibits the recipients of this Code of Ethics from using the funds received from the Public Administration and/or from interprofessional funds for purposes other than those for which they were disbursed.

Similarly, in the case of participation in public tender procedures, the recipients of this Code of Ethics are required to operate in compliance with the law and correct commercial practice, in particular avoiding inducing the Public Administration to operate unduly in favor of the company.

The use of altered or falsified declarations or documents or the omission of information or, in general, the performance of artifices or deceptions, aimed at obtaining concessions, authorizations, financing, contributions from the European Union, the State or other Public Body, also constitutes unlawful conduct.

3.5 Public supervisory authorities

The company interacts transparently with all political forces, associations present in the area and public institutions (territorial and national) in order to duly represent its positions on topics and themes of interest.

3.6 Political forces, associations and institutions with interests

The recipients of this Code of Ethics undertake:

- To scrupulously observe the provisions issued by the competent institutions or Public Supervisory Authorities for compliance with the legislation in force in the sectors connected to the respective areas of activity.
- Not to submit, in the context of ongoing investigations with Institutions and/or Public Supervisory Authorities, requests or requests containing untruthful declarations in order to obtain public grants, contributions or subsidized financing or to unduly obtain concessions, authorisations, licenses or other documents administrative.
- To comply with any request from the above-mentioned institutions or Authorities within the scope of their respective supervisory functions, providing full cooperation and avoiding obstructionist behaviour.

4 Section 4 – Principles of conduct that staff must comply with

4.1 Professionalism

Each person carries out their work activity and performances with diligence, efficiency and correctness, making the best use of the tools and time at their disposal and assuming the responsibilities connected to the obligations.

4.2 Loyalty

People are expected to be loyal to the company.

4.3 Honesty

As part of their work, the people of the company are required to know and diligently respect the laws in force. Honesty represents the fundamental principle for all the company's activities, for its initiatives and constitutes an essential value of organizational management. Relationships with stakeholders, at all levels, must be based on criteria and behaviors of correctness, collaboration, loyalty and mutual respect. Under no circumstances can the pursuit of corporate interests justify dishonest conduct.

4.4 Legality

The organization undertakes to comply with all national and international standards, laws, directives and regulations and all generally recognized practices.

4.5 Correctness and transparency

People do not use for personal purposes information, goods and equipment at their disposal in carrying out the function or task assigned to them. Each person does not accept or make pressure, recommendations or reports for himself or others that could cause harm to the company or undue advantages for himself, for the company or for third parties. Each person rejects and does not make promises of undue offers of money or other benefits. The company is committed to operating in a clear and transparent manner, without favoring any interest group or individual.

4.6 Confidentiality

The people ensure maximum confidentiality regarding news and information constituting the company assets or inherent to the company activity, in compliance with the provisions of the law, current regulations and internal procedures. Furthermore, company personnel are required not to use confidential information for purposes unrelated to the exercise of their business.

4.7 Responsibility towards the community

The company, aware of its social role in the reference territory, on the economic and social development and on the general well-being of the community, operates with respect for national and local communities.

4.8 Resolution of conflicts of interest

In carrying out their work, people pursue the general objectives and interests of the company. They inform their superiors or representatives without delay of situations or activities in which there could be an interest in conflict with that of the company, on the part of the people themselves or their close relatives and in any other case in which there are significant reasons of convenience. People respect the decisions taken by the company in this regard.

4.9 Sense of belonging

In carrying out their work, people pursue everything that does not hinder or compromise in any way the creation of a sense of belonging to their organisation, work group or towards third parties.

4.10 Mutual respect

People engaged in any capacity in collaboration with the company require and actively demonstrate respect for the tasks, skills, methods of carrying out the tasks also through the omission of their personal considerations to third parties.

4.11 Specific obligations

Company employees must follow the instructions below:

Transparency

- It is a good rule that all information relating to the activities carried out within the company is within everyone's reach.
- Each collaborator has the task of relating to their manager and colleague in relation to the work they carry out.
- In case of misunderstandings or problems, it is everyone's duty to first contact their manager or contact person.
- Behave in a scrupulously loyal manner and independent of conditions of any kind that could influence the actions.
- Do not entertain improper economic relationships, nor accept valuable gifts or favors of any kind from anyone.
- Report, upon acceptance of the professional assignment or during its performance, any relationship or common interest with external organizations that maintain relationships with the company, which may lead to conflicts of interest.

Consistency

- Once you make a commitment you follow through. Never leave a job unfinished and never take on commitments that you already know you won't be able to meet.

Courtesy and kindness

- Courtesy and kindness are and must be the basis of every daily activity; they must also be a constant in interpersonal relationships both inside and outside the company.

Punctuality

- If you are late for a meeting it is a good rule to notify your delay before the agreed time expires; doing so later, is impolite.
- Punctuality is a form of respect towards those who are waiting for us.

Confidentiality

- All information and data handled in the workplace are company property and confidential and must be treated as such. In particular, you should never talk about work problems or situations in public places where you can be heard, or in the presence of people who have no right to be affected by the information in question.

Professionalism

- Whatever activity you carry out, you must always be professional. Being professional means knowing all the appropriate behaviours, everything you need to do your job in the best possible way, taking into account the needs of customers and the company.

Work place

- Everyone must have the ability to understand the phenomena that underlie interpersonal relationships and adopt behaviour consistent with the reference context, always trying to maintain a polite, cordial and collaborative climate with colleagues.

Corporate loyalty and respect

- It is everyone's duty to share company policies and work to ensure that these are respected.
- During daily activity, each collaborator must always preserve the interests and image of the company, as well as have the respect for company properties.
- When carrying out your business you must always evaluate the economic implications of your choices, avoiding waste.

Respect for the customer

- The company, like all free market companies, lives thanks to its customers.
- Respect, kindness and courtesy must be a constant in the relationships.

Workstation

- Each employee is responsible for their own workplace. Everyone is responsible for the care and cleaning of the instruments at their disposal.

Computer

- The supplied computers must be kept in the best possible condition. Programs other than those required by the company configuration cannot be installed.
- The hardware equipment made available by the company cannot be used for personal purposes.
- Electronic documents constitute company assets and cannot be arbitrarily damaged and/or destroyed
- It is absolutely forbidden to use hardware equipment suitable for copying and/or storing files and data, such as USB mass memories, laptops, optical discs and any other electronic storage device, unless expressly authorized by the company.

Internet

- The Internet connection is a work tool and must be used as such.
- Use of the Internet for private purposes is not permitted.

- Browsing the Internet:
 - ✓ It is not permitted for those sites that do not directly relate to the performance of the assigned tasks, especially those that may reveal the employee's political, religious or trade union opinions.
 - ✓ It is not permitted to carry out any kind of financial transaction, including remote banking operations, online purchases except in cases directly authorized by the company and in compliance with normal purchasing procedures.
 - ✓ The download and installation of free software (freeware), shareware, P2P and/or FTP, taken from Internet sites, is not permitted unless expressly authorized by the company.
 - ✓ Any form of registration on sites whose contents are not related to work is prohibited.
 - ✓ Participation, for non-professional reasons, in forums or the use of chat is not permitted; The storage of electronic documents of an offensive and/or discriminatory nature based on sex, language, religion, race, ethnic origin, opinion and trade union and/or political affiliation is not permitted.

Email

- Email is a business tool and should not be considered private correspondence. Therefore:
 - ✓ Any email message (as it is work-related) may be copied and/or made public at any time.
 - ✓ It is not permitted to use e-mail (internal or external) for reasons not related to the performance of assigned duties.
 - ✓ It is not permitted to send or store messages (internal or external) of an offensive nature, discriminatory based on sex, language, religion, race, ethnic origin, opinion or trade union and/or political affiliation.
 - ✓ It is not permitted to set up and use personal email accounts.

Cell phones

- The use of the cell phone has rules of good behaviour that must always be respected and since the telephone is a work tool, it must always be kept in silent mode during meetings with customers.
- The use of private cell phones is carried out in accordance with the company's internal rules.

Company car

- The company ensures the suitability of the car entrusted to the employee, with compliance with current regulations, as well as in terms of correct maintenance of all its components, including tyres.
- The company car is the responsibility of the person to whom it is assigned; like all company assets, it must be used and maintained with the right care.
- It must be conducted in full compliance with the requirements of the Highway Code.
- It is up to the driver assigned to the vehicle to take care of cleanliness, and in any case always check that the car is in the best possible conditions.
- Any fines resulting from infringements of the Highway Code remain the responsibility of the driver. Infringements may also include internal disciplinary sanctions.

Private car

- The use of the private car for work purposes is permitted only with written authorization from the company which includes verification of compliance with current regulations and correct maintenance of all its components, including tyres.
- It must be conducted in full compliance with the requirements of the Highway Code.

- It is up to the driver who owns the vehicle to take care of cleanliness, and in any case always check that the car is in the best possible conditions.
- Any fines resulting from infringements of the Highway Code remain the responsibility of the driver. Infringements may also include internal disciplinary sanctions.

5 Section 5 – Criteria of conduct

5.1 Introduction

The rules contained in this section have the purpose of indicating to the recipients of this Code of Ethics the attitudes and behaviours to be observed during the performance of company activities in accordance with the values which inspire this document.

All recipients of this Code of Ethics must observe correct and transparent conduct in carrying out their functions, thus contributing to the effectiveness of the internal control system to protect company value.

5.2 Relations with staff

▪ Personnel selection

The evaluation of the staff to be hired or with whom to start collaborative relationships is carried out based on the correspondence of the candidates' profiles with respect to those expected and internal needs, in compliance with equal opportunities for all interested parties. The information requested is strictly linked to the verification of the aspects required by the professional and psycho-aptitude profile, respecting the candidate's private sphere and opinions. The company adopts, in its selection activity, appropriate measures in order to avoid favoritism and facilitations and carries out a careful selection based not only on the mandatory aspects, but also on aspects approved by the Top Management.

▪ Establishment of the employment relationship

The staff is hired with a regular employment, professional service or contract: any form of irregular work is not tolerated.

▪ Integrity and protection of the person

As part of the personnel management and development processes, as well as during the selection phase, the decisions made are based on the correspondence between expected profiles and profiles possessed by the people and/or on considerations of merit. Access to roles and assignments occurs exclusively on the basis of skills and abilities. Furthermore, compatibly with the general efficiency of work, forms of flexibility in the organization of work are used to facilitate people in maternity/paternity status, as well as those who have to take care of children.

▪ Enhancement and training of resources

The company makes information and training tools available to people with the aim of enhancing specific skills and maintaining the professional value of the staff. Institutional training is provided, provided at certain moments of professional life, internal to the person (example: an introduction to the activity is provided for new hires) and recurring training aimed at operational staff (example: training on safety and Code of Ethics).

5.2.1 Safety and health

The company is committed to offering a working environment capable of protecting the health and safety of its staff, spreading and consolidating a culture of safety, developing awareness of risks and promoting responsible behavior by everyone.

The company works to preserve the health and safety of its workers, especially with preventive actions.

Among the main objectives is to protect human resources by constantly seeking the necessary synergies not only internally but also with suppliers, external consultants and customers involved in company activities.

All employees are required to comply with the internal rules and procedures regarding risk prevention and health and safety protection and to promptly report any deficiencies or failure to comply with the applicable rules.

The company adopts the general measures to protect health and safety at work prescribed by law with particular reference to the provisions of Legislative Decree no. 81/2008 and subsequent amendments. In particular:

- **It defines the operational procedures to be followed and coordinates activities regarding health and safety at work.**
- **It ensures the application of current regulations which it constantly controls, and works towards their implementation.**

Furthermore, the company undertakes to guarantee:

- **The assessment of all health and safety risks.**
- **Prevention planning, aimed at a complex that coherently integrates operational conditions into prevention, as well as the influence of environmental factors and work organization.**
- **The elimination of risks and, where this is not possible, their reduction to a minimum in relation to the knowledge acquired based on technical progress.**
- **Respect for the ergonomic principles of work organization, in the design of workplaces, in the choice of equipment and in the definition of work and service delivery methods, in particular with a view to reducing the health effects of monotonous work and the repetitive one.**
- **Reducing risks at source.**
- **The replacement of what is dangerous with what is not or is less dangerous.**
- **Limiting to a minimum the number of workers who are or may be exposed to risk.**
- **The limited use of chemical, physical and biological agents in the workplace.**
- **The priority of collective protection measures over individual protection measures.**
- **Health checks of workers.**
- **The removal of the worker from exposure to risk for health reasons relating to his person and movement where possible to another job.**
- **Adequate information and training for workers, managers, supervisors and all staff.**
- **Adequate instructions for workers.**
- **Participation and consultation of workers and their representatives.**
- **The planning of measures deemed appropriate in order to guarantee the improvement of safety levels over time also through the adoption of codes of conduct and good practices.**

- The emergency measures to be implemented in the event of first aid, fire fighting, worker evacuation and serious and immediate danger.
- The use of warning and safety signs.
- Regular maintenance of environments, equipment and systems with particular attention to any safety devices in accordance with the instructions of the respective manufacturers.
- Adequate instructions for employees, collaborators and users and training for them in accordance with the provisions of the law and the contract applied to personnel.

5.2.2 Privacy protection

When processing its staff data, the company complies with the provisions contained in European Regulation 679/2016 (GDPR).

Individuals are provided with a privacy policy which identifies:

- **Purpose and methods of processing.**
- **Any subjects to whom the data are communicated.**
- **Information necessary to exercise the right of access referred to in Art. 15 of the GDPR.**

In cases where the law requires it, individuals are asked for specific consent to the processing of personal data. Any investigation into the ideas, preferences, personal tastes and in general the private life of employees and collaborators is excluded.

5.2.3 Environmental Protection

The organization is committed to pursuing environmental protection through compliance with national and community laws and regulations. It is committed to not polluting and to raising awareness of employees and collaborators on environmental issues. As a corollary to the previous point, the company intends to conduct its activities and make its investments in a socially responsible manner from an environmental point of view, also ensuring complete and exhaustive communications with the community, in full compliance with the Legislative Decree. n 152/2006 and subsequent amendments. Environmental protection is considered a primary objective and is therefore pursued starting from the individual behaviour of people, who are provided with the information and instructions necessary for the purposes of "energy saving", "waste management" and recyclable materials.

5.3 Staff duties

People must comply with the obligations signed in the employment contract, as provided for in the Code of Ethics and implementation procedures approved by the company (Procedures of Quality Management System UNI EN ISO 9001: 2015, Occupational Health and Safety Management System UNI ISO 45001: 2018, Environmental Management System UNI EN ISO 14001: 2015, Gender Equality Management System UNI/PdR 125: 2022), ensuring the required performances.

5.3.1 Delegations and responsibilities

The duties, responsibilities and powers of the directors, employees and collaborators are defined through specific resolutions and/or specific procedures. These duties, responsibilities and powers must be known, accepted and respected.

5.3.2 Obligations for function managers towards the Code of Ethics

Each function manager, identified as such in the organization chart, job description and/or delegation system, has the obligation to:

- **Ensure compliance with the Code of Ethics by the subjects directly or indirectly subject to its responsibility.**
- **Represent an example for employees/collaborators.**
- **Ensure that employees understand that the provisions contained in this Code of Ethics constitute an integral part of their work performance.**
- **Promptly report any special needs to the Management Board.**

Failure by function managers to comply with the obligations set out in this chapter may result in the application of disciplinary sanctions, as provided for by the sanctioning system.

5.3.3 Obligations for all employees towards the Code of Ethics

Each employee is required to know the provisions contained in the Code of Ethics or referred to by it, as well as the relevant legal provisions that regulate the activity carried out within the scope of their function which constitute an integral part of each individual's work performance. The employee who has news of alleged illicit conduct is required to communicate the information in his possession only to his superiors or to the Board of Directors and/or the General Management in the manner established by the internal system compliant with ANAC Resolution no. 311 of 12 July 2023 - Guidelines on the protection of people who report violations of Union law and the protection of people who report violations of national regulatory provisions. Procedures for the presentation and management of external reports.

Employees also have the obligation to:

- **Refrain from behavior contrary to these provisions and rules.**
- **Report promptly to the Management Board any news regarding possible violations of the Code of Ethics.**
- **Collaborate with the organization in the event of any investigations aimed at verifying and possibly sanctioning possible violations.**

These behavioural requirements are also required to external consultants and collaborators.

5.3.4 Protection of company assets

Each recipient is required to work diligently to protect company assets from improper or incorrect use.

People must know and implement the provisions of internal policies on information security in order to guarantee integrity, confidentiality and availability.

Information and know-how must be protected with the utmost confidentiality. The most significant data that the company acquires or creates in the course of its business is confidential information and subject to adequate attention: this also includes information acquired from and third parties (customers, contacts, partners, employees)

Both during and after the end of the relationship with the company, people will be able to use the confidential data exclusively in the company's interests and never for their own benefit and/or that of third parties.

5.3.5 Confidential information about third parties

Company personnel must refrain from using illicit means to acquire confidential information on other third-party organizations and bodies.

Those who, within the framework of a contractual relationship, become aware of confidential information about other subjects are required to use it exclusively as foreseen in the contract in question.

Without proper authorization, individuals may not request, receive or use confidential information regarding third parties.

5.3.6 Use of company assets

Each person is required to work diligently in order to protect company assets through responsible behavior and in line with the operating procedures set up to regulate their use by precisely documenting their use.

In particular, each person must:

- **Use the goods entrusted to him scrupulously.**
- **Avoid improper use of company assets that could cause damage or reduce efficiency or are in any case in conflict with the company's interests.**
- **Adequately guard the entrusted resources and promptly inform the relevant units of any threats or harmful events for the company.**

As regards IT applications, everyone is expressly required to:

- **Scrupulously adopt the provisions of the company security policies in order not to compromise the functionality and protection of the IT systems.**
- **Refrain from sending threatening or abusive e-mail messages or from using low-level language or from expressing inappropriate comments that may cause offense to people and/or damage the company's image.**
- **Refrain from browsing websites with indecorous and offensive content and in any case not related to professional activities.**

5.4 Relationships with customers

The company is committed to offering its products and services without any discrimination between customers.

5.4.1 Contracts and communications to customers

Contracts and communications to customers by the company must always be:

- **Clear and simple, formulated with language as close as possible to that normally used by the interlocutors.**
- **Compliant with current regulations and such as not to constitute evasive or otherwise incorrect practices.**
- **Complete so as not to overlook any relevant element for the purposes of the customer's decision.**

5.4.2 Behavior style of staff towards customers

The style of behavior of the company's people towards customers is based on availability, respect and courtesy, with a view to a collaborative relationship and high professionalism.

5.4.3 Data processing

In the processing of customers' personal data, the organization complies with the provisions contained in European Regulation 679/2016 (GDPR).

A privacy policy is provided which identifies:

- **Purpose and methods of processing.**
- **Any subjects to whom the data are communicated.**
- **Information necessary to exercise the right of access referred to Art. 15 of the GDPR.**

In cases where the law requires it, individuals are asked for specific consent to the processing of their personal data; any investigation into the ideas, preferences, personal tastes and in general the private life is excluded

5.5 Relationships with suppliers

The company is committed to sourcing its products and services without any discrimination between suppliers.

5.5.1 Choice of supplier

The purchasing processes are based on:

- **Search of the maximum competitive advantage for the company.**
- **Granting equal opportunities to suppliers.**
- **Loyalty.**
- **Impartiality**

The selection of suppliers and the determination of the purchasing conditions are based on an objective evaluation of the quality, price of the good or service, its actual availability as well as guarantees of assistance and timeliness.

Suppliers who have ongoing criminal proceedings are not selected.

5.5.2 Integrity and independence in relationships

Relationships with suppliers, including those concerning financial and consultancy contracts, are subject to constant monitoring by the company.

The stipulation of a contract with a supplier must always be based on extremely clear relationships, avoiding, where possible, forms of dependence.

5.6 Relations with the Public Administration

This section discusses the relationships between the company and the Public Administration.

5.6.1 Correctness and loyalty

The company intends to conduct relations with the Public Administration with maximum transparency and ethical behaviour. These relationships, which must take place in compliance with current laws, are aligned with the general principles of correctness and loyalty so as not to compromise the integrity of both parties.

5.6.2 Gifts and benefits

No person in the company can give money or offer economic advantages or other types of benefits to Public Administration subjects, for the purpose of obtaining assignments or other personal advantages or for the company itself.

Any form of gift that could be interpreted as exceeding normal commercial or courtesy practices or in any case aimed at acquiring preferential treatment in the conduct of any activity connected to the company is not permitted.

In this sense, a "normal commercial or courtesy practice" of exclusively symbolic value is considered a gift.

In particular, any form of gift to Italian and external public officials or their family members that could influence their independence of judgment with the aim of obtaining more favorable treatment or undue benefits or advantages of various kinds is prohibited.

By gift we mean any type of benefit: not only material goods but also, for example, free participation in conferences, training courses, the promise of a job offer.

The above cannot be circumvented by resorting to third parties: in this regard, not only illicit payments made directly to entities or their employees but also illicit payments made to people acting on behalf of such entities are considered acts of corruption.

On the occasion of anniversaries and/or holidays, the donation of goods is permitted as long as it is of a modest amount and in any case within the limits approved by the Board of Directors or General Management. However, if a person in the company receives explicit or implicit requests for benefits from a member of the Public Administration, he immediately informs the Management Board for the adoption of appropriate checks and initiatives.

5.7 External Relations

This section covers details regarding the company's external relations.

5.7.1 External effectiveness of the Code of Ethics

Anyone acting in the name and on behalf of the company comes into contact with third parties with whom the organization intends to undertake commercial relations or is required to have relations of an institutional, social, political or any nature with them, has the obligation to:

- **Inform these subjects of the commitments and obligations imposed by the Code of Ethics.**
- **Demand compliance with the obligations of the Code of Ethics in carrying out their activities.**
- **Adopt the necessary initiatives in case of refusal by third parties to adapt to the Code of Ethics or failure or partial execution of the commitment undertaken to observe the provisions contained in the Code of Ethics itself, informing the Management Board**

5.7.2 Conflict of interest

All recipients must ensure that every decision taken in the context of their activities is taken in the interests of the company.

All recipients are required to avoid any activity or situation of personal interest that constitutes or could constitute, even potentially, a conflict between their own interests and those of the organization and, in any case, must comply with the specific procedures adopted by the company in the field.

All recipients of the Code of Ethics must refrain from taking advantage of their relationship with the company in order to benefit themselves or third parties to the detriment or disadvantage of the organization itself.

Every employee is prohibited from taking part, directly or indirectly, in any capacity, in commercial initiatives that are in direct competition with the company, unless such participation has been previously communicated to the Management Board and approved by the same.

In the event that situations of conflict of interest, even potential, are identified, both internal and external to the company's activity, each person involved is required to refrain from engaging in conflicting conduct by promptly reporting it to the Management Board, which is responsible for the assessment. regarding the existence, case by case, of any incompatibility or prejudicial situations.

5.7.3 Competitive practices

For the company it is of primary importance that the market is based on fair and fair competition.

The company undertakes to scrupulously observe the relevant laws and collaborate with the market regulatory authorities. In particular:

- **Compete fairly on the market by respecting competition rules.**
- **It undertakes to provide correct information about its business both internally and externally in response to legitimate requests.**
- **It ensures the truthfulness and correctness of the company data relating to financial statements, reports and other official documents.**

5.7.4 Gifts and benefits

See previous paragraph 5.6.2

6 Section 6 – Application mechanisms of the Code of Ethics

6.1 Organizational principles

The company ensures that the organizational system is based on the criterion of separation between those who decide, those who execute and those who control. In particular, the organization makes all operations verifiable because they are recorded. Each operation and/or activity must be lawful, authorized, coherent, documented, verifiable in compliance with the principle of traceability and company procedures according to the criteria of prudence and protection of company interests.

Company procedures allow checks to be carried out on operations, authorization processes and the execution of the operations themselves.

Each collaborator who carries out operations involving sums of money, goods or other benefits that can be economically assessed as belonging to the company must reasonably provide the appropriate evidence in order to allow the verification of the aforementioned operations.

6.2 Accounting transparency

The company's accounting responds to the principles of truth, accuracy, completeness and transparency of the recorded data. The recipients of this Code of Ethics undertake to abstain from any behaviour, active or omissive, which directly or indirectly violates the regulatory principles and/or internal procedures relating to the formation of accounting documents and their external representation.

The recipients of this Code of Ethics are also required to keep and make available, for each operation or transaction carried out, adequate supporting documentation in order to allow:

- **Accurate accounting records.**
- **The immediate identification of the underlying characteristics and motivations.**
- **The easy formal and chronological reconstruction.**
- **The verification of the decision, authorization and implementation process, in terms of legitimacy, coherence and congruity as well as the identification of the various levels of responsibility.**

The recipients of this Code of Ethics who become aware of cases of omission, falsification or neglect in accounting records or supporting documentation are required to promptly report them to their superior or to the Management Board or Top Management.

The company promotes training and courses in order to make the recipients of this Code of Ethics aware of the rules (laws or regulations, internal prescriptions) of accounting documentation.

6.3 Controls and checks

The company guarantees its availability, through competent people, to provide all the necessary information and requests to the audit and control bodies.

The company guarantees accessibility to all information and documents to those entitled and provides, through the availability of its directors and employees, responsible for their function, all information that facilitates the exercise of supervisory functions. The organization prohibits its directors and employees and/or collaborators from making false statements, presenting false documents or certifying untrue situations, also through IT systems, with the aim of obtaining advantages for themselves or for the company.

6.3.1 Supervision regarding the implementation of the Code of Ethics

The task of verifying the implementation and application of the Code of Ethics is responsibility of:

- **Management Board;**
- **Top Management;**

6.3.2 Reporting problems or suspected violations

Violations of the Code of Ethics, possibly committed by the recipients, are subject to the envisaged disciplinary system.

It is specified, in fact, that in the event of violations of the Code of Ethics, the company adopts disciplinary measures against those responsible for the violations themselves, where deemed necessary for the protection of the organisation's interests, which may go as far as expulsion from the company. of those responsible in addition to compensation for any damages resulting from the violations.

Failure to comply with the rules of the Code of Ethics by members of the corporate bodies may result in the adoption, by the competent corporate bodies, of the most suitable measures provided for and permitted by law.

Violations of the rules of the Code of Ethics by employees constitute a failure to fulfill the obligations deriving from the employment relationship, with all contractual and legal consequences, also with reference to their relevance as a disciplinary offence.

Violations committed by suppliers and external collaborators are sanctionable in accordance with the provisions of the relevant contractual assignments, except for more significant violations of the law.

Particular attention is given to the processing of IT data through internal systems: any problem and suspected violation must be immediately communicated to the IT services manager and/or to the General Management for appropriate action.

6.3.3 Disciplinary measures following violations

The provisions of this Code of Ethics are an integral part of the contractual obligations assumed by the staff as well as by the subjects having relations with the company.

Violation of the principles and behaviors indicated in the Code of Ethics compromises the relationship of trust between the company and the perpetrators of the violation, be they directors, employees, consultants, collaborators, customers or suppliers.

- **As regards employees (including members of the Management Board) through adequate disciplinary measures, regardless of the possible criminal relevance of the behaviour and the establishment of criminal proceedings, in cases where the conduct constitutes a crime. In particular, the sanctions will comply with the rules and logic of the applied employment contract. Disciplinary measures range from reprimand or warning to suspension without pay, demotion and, in the most serious cases, dismissal. Before taking disciplinary action, the person concerned is given the opportunity to explain your behaviour.**
- **As regards consultants, collaborators, customers, suppliers and other subjects having contractual relationships with the company, specific methods for terminating the contractual relationship are activated.**

Furthermore, any compensation for damages that the company may suffer as a result of the violation by the above-mentioned subjects of the provisions contained in the Code of Ethics is reserved.

6.4 Public service assignment

The company, in the case of carrying out public service activities, applies the following behaviours:

- **Respect for the principles of impartiality, typical of Public Administration.**
- **Non-acceptance of benefits, money and benefits.**
- **Non-acceptance of illegitimate influence from third parties.**
- **Avoid conflicts of interest of your appointees.**

6.5 Confidentiality

The recipients are required to observe maximum confidentiality on information, documents, studies, initiatives, projects and contracts known for the services performed.

The company implements measures to protect the information managed and prevent it from being accessible to unauthorized personnel.

6.6 Dissemination, communication and training

In order to prevent violations of current regulations, as well as of the Code of Ethics itself, the company provides for the adoption of specific procedures by all those involved in the operational process (Quality Management System UNI EN ISO 9001: 2015, Occupational Health and Safety Management System UNI ISO 45001: 2018, Environmental Management System UNI EN ISO 14001: 2015, Gender Equality Management System UNI/PdR 125: 2022), aimed at identifying the responsible subjects of the decision-making, authorization and carrying out processes of the operations themselves.

This Code of Ethics is brought to the attention of all internal and external parties interested or otherwise involved through specific communication and training activities.

6.7 Operating procedures and decision-making protocols

In order to prevent violations of current regulations, as well as of the Code of Ethics itself, the company provides for the adoption of specific procedures by all those involved in the operational process (Quality Management System UNI EN ISO 9001: 2015, Occupational Health and Safety Management System UNI ISO 45001: 2018, Environmental Management System UNI EN ISO 14001: 2015, Gender Equality Management System UNI/PdR 125: 2022), aimed at identifying the responsible subjects of the decision-making, authorization and carrying out processes of the operations themselves.

6.8 System of delegations

Apart from the already qualified subjects (Top Management), the company uses a system of delegations on the basis of which certain activities can only be carried out by subjects expressly authorized to do so because they have power attributed through a specific official delegation and/or or notarial power of attorney.

It is in fact necessary that the individual operations are carried out in the various phases by different subjects, whose skills are clearly defined and known within the organization in order to avoid unlimited or excessive powers being attributed to individual subjects.

7 Section 7 – Final provisions

7.1 Conflicts with the Code of Ethics

In cases where even just one of the provisions of this Code of Ethics should conflict with the provisions set out in the internal regulations or procedures, the Code of Ethics will prevail over any of these provisions.

7.2 Approval process and changes

This Code of Ethics was approved by the company Management Board on:

Code of Ethics approval date: 27/11/2023

Any variation and/or addition to this Code of Ethics will be approved by the Board of Directors and promptly disseminated to all recipients of the same.