

## CODE OF ETHICS FOR ANTI-CORRUPTION

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## 1. INTRODUCTION

The conduct of its activities conforms to the principles and rules of conduct expressed in this Code of Ethics and in the national and international legislation in force, where applicable.

The organization recognizes the importance of ethical-social responsibility and environmental protection in the conduct of the Company's business and activities and, to this end, promotes a management of the Company oriented towards balancing the legitimate interests of its stakeholders and the community in which it operates. The Code is, therefore, based on an ideal of respect for all the interests of the parties involved.

The performance of the services by the Company's employees and collaborators is carried out according to criteria of diligence, competence, professionalism and efficiency, in order to provide all stakeholders with a correct corporate image and above all high-quality services.

The company has also implemented a management system for its social responsibility in compliance with the requirements of the international standard SA (Social Accountability) 8000.2014. The relevant manual defines and describes the social responsibility requirements with reference to:

- child labour;
- to forced work;
- health and safety;
- freedom of association and the right to collective bargaining;
- discrimination;
- disciplinary procedures;
- working hours;
- remuneration;
- to the management system.

Interested parties are to be considered human resources (employees, collaborators), shareholders, directors, suppliers, customers, public administration, the community and, in a broader sense, all parties involved, directly and/or indirectly, in the Company's activities.

It is the Management's task to approve the Code of Ethics. The verification of the state of adequacy of the Code of Ethics with respect to the sensitivity of the Company, its implementation and its application is the responsibility of the Management itself with the support of the Human Resources and Quality offices.

## 2. ETHICAL VISION

The organization has set the priority objective of its activity in achieving the highest standards of quality and reliability for the products and services provided.

The achievement of this goal is made possible thanks to the following factors:

- clear strategic vision;
- secure financial equilibrium;
- Experience;
- constant search for innovation;
- vocation to the service of the customer.

The organization works for the continuous improvement of processes, inspired by some fundamental values:

- operate according to the principles of maximum satisfaction of customer expectations;
- manage the relationship with the customer with the utmost clarity and transparency, offering all the necessary technical, commercial and financial information, and ensuring continuous and prompt assistance;
- to inform its internal and external activities with the utmost respect for the human person, in the belief that ethics in the management of safety at work and environmental protection must be pursued together with the success of the company;
- to recognize a strategic role for human resources, maintaining relationships with them based on mutual respect and the rejection of any form of discrimination based on age, sex, sexuality, state of

- health, race, nationality, political opinions or religious beliefs;
- recognize an indispensable role in training, empowerment and involvement at all levels of all staff, while ensuring respect for physical and moral integrity;
  - rationalize business management in all its areas;
  - operate in the market in compliance with fundamental ethical principles, such as honesty, impartiality and in compliance with all the rules and regulations in force (national and EU laws, internal regulations or codes, administrative measures, deontological rules), committing not to start or continue any relationship with those who do not intend to align themselves with this principle.

### 3. THE STRUCTURE OF THE CODE OF ETHICS

This Code of Ethics consists of:

- *general principles*, which define the ethical values of reference
- *criteria of conduct*, which specifically provide the guidelines and rules to which all employees and collaborators must comply;
- *implementation methods*, which describe the control system aimed at compliance with the Code of Ethics and its improvement.

### 4. RECIPIENTS AND SCOPE OF APPLICATION OF THE CODE

The recipients of the Code of Ethics are all partners, directors, employees, collaborators, as well as all those who, directly or indirectly, permanently or temporarily, establish relationships or relationships with the organization itself.

In view of this, the company promotes the widest dissemination of the Code to all interested parties, the correct interpretation of its contents, and provides the most appropriate tools to facilitate its application.

The organization also implements the necessary measures in order to carry out verification and monitoring activities of the application of the Code itself.

### 5 CONTRACTUAL VALUE AND VIOLATION OF THE CODE OF ETHICS

The rules of the Code of Ethics constitute an essential part of the contractual obligations of personnel pursuant to and for the purposes of art. 2104, 2105 and 2106 of the Civil Code.

Art. 2104 of the Italian Civil Code, entitled "Diligence of the worker", states: "The worker must use the diligence required by the nature of the service due, by the interest of the company and by the superior interest of national production. He must also observe the provisions for the execution and discipline of work given by the entrepreneur and his collaborators on whom he hierarchically depends".

Art. 2105 of the Italian Civil Code, entitled "Duty of Fidelity", it states: "The employee must not deal with business, on his own behalf or on behalf of third parties, in competition with the entrepreneur, nor disclose information relating to the organization and production methods of the company, or use them in such a way as to be detrimental to it".

Art. 2106, entitled "Disciplinary sanctions", states: "Failure to comply with the provisions contained in the two previous articles may give rise to the application of disciplinary sanctions, depending on the seriousness of the infringement".

Violation and failure to comply with the principles expressed in the Code of Ethics compromises the relationship of trust established with the Company and may lead, depending on the case, to disciplinary actions and compensation for damages, without prejudice, for employees, to compliance with the procedures provided for by art. 7 of Law no. 300/1970 (the so-called Workers' Statute) and the applicable collective labour agreements.

Compliance with the rules of the Code of Ethics is also considered necessary in the context of contractual relations with parties outside the company.

### 6 MONITORING OF THE APPLICATION OF THE CODE OF ETHICS

The company is firmly committed to ensuring compliance with the principles set out in the Code of Ethics through the establishment of a responsible function appointed within the company to which the functions of supervision, monitoring and implementation of this Code of Ethics are delegated.

The aforementioned function is assigned, among others, the tasks of:

- promote the implementation of the Code;
- promote communication programs and specific training of management and employees;
- examine reports of possible violations of the Code of Ethics, promoting the most appropriate checks

## 6. REFERENCE PRINCIPLES

### 6.1 Compliance with Law

Compliance with the law, transparency and managerial correctness, trust and cooperation with stakeholders are the ethical principles that inspire the company and from which it derives its models of conduct, in order to compete effectively and fairly on the market, improve the satisfaction of its customers and develop the skills and professional growth of its human resources.

To this end, the organization requires its members, directors, employees, collaborators, agents, commercial partners, suppliers, contractors and anyone who performs representative functions in any capacity, even de facto, to comply with the legislation and all the regulations in force and the principles and procedures preordained for this purpose, as well as ethically correct behavior, such as not to jeopardize their moral and professional reliability.

The main reference standards for the organization are:

- Legislative Decree 81/2008 and ss.mm. (Safety at work)
- Legislative Decree 152/2005 and ss.mm. (TU Ambiente)
- European Regulation no. 679/2016;
- Legislative Decree No. 231 of 8 June 2001 - "Administrative Liability of Entities" and subsequent amendments and/or additions;
- Administrative rules relating to the management of the personnel office
- Rules relating to general obligations in the field of work
- National accounting standards
- Principles of good corporate governance
- Current tax legislation
- Applicable National Collective Labour Agreements
- Internal regulations

### 6.2 Professional Integrity

Professional integrity is the fundamental principle for all the activities of the organization, its initiatives, its reports, its communications, and is an essential element of the management and operation of its human resources.

Relations with stakeholders are based on criteria and behaviour of fairness, collaboration, loyalty and mutual respect. For this reason, any form of benefit or gift, received or offered, which could be understood as a tool aimed at influencing the independence of judgment and conduct of the parties involved, is refused.

The Recipients of this Code of Ethics:

- they must act in accordance with loyalty and good faith, with diligence, efficiency and fairness;
- they must base their conduct on mutual collaboration, in compliance with internal procedures and making the best use of the company tools and the time available to them.

### 6.3 Transparency and completeness of information

The Company recognises the fundamental value of providing its shareholders, bodies and competent functions with regard to significant facts concerning corporate and accounting management and in no way justifies actions by its collaborators that prevent control by the bodies or organisations in charge.

The company promotes a continuous, punctual and complete flow of information between the corporate

bodies, the various company areas, the Management, the various top figures, and, where necessary, towards the Public Authorities.

In any case, the information transmitted outside and within the organization itself complies with the requirements of truthfulness, completeness and accuracy, also in relation to economic, financial and accounting data.

#### 6.4 Fairness in corporate management and use of resources

The organization pursues its corporate purpose in compliance with the law and the Articles of Association, ensuring the proper functioning of the corporate bodies and the protection of the patrimonial and participatory rights of its members, safeguarding the integrity of the share capital and assets.

#### 6.5 Relationship with Members

The organization undertakes to ensure that, in accordance with the law and the Statute, all members are recognized as equal in information, thus favoring the widespread and informed participation of the same in the decisions of their competence.

The company orients its activity to the satisfaction and protection of its members, striving to ensure that economic performance is such as to safeguard and increase the value of the company.

#### 6.6 Confidentiality of Information

The organization ensures the confidentiality of the information in its possession, compliance with the regulations on the management of personal data and refrains from seeking confidential data through illegal means.

All information available to the Company is processed in compliance with the confidentiality and privacy of the interested parties.

Anyone who comes into possession of information of corporate interest, or relating to any stakeholder, under no circumstances should feel authorized to disseminate or use it outside the operational purposes for which he or she has been authorized by the company's management.

#### 6.7 Protection of company assets

Each Recipient is responsible for the protection and conservation of the tangible and intangible company assets entrusted for the performance of their duties, as well as for their use in a manner consistent with the company's purposes.

The Recipients of this Code are prohibited from using for personal purposes the information, goods and equipment they have in the performance of the function or task entrusted to them.

#### 6.8 Value of Human Resources

The company recognizes the centrality of the "Human Resources" stakeholder and the importance of establishing and maintaining relationships based on loyalty and mutual trust, enhancing the skills of the individual as much as possible. In this sense, Human Resources are understood to be both employees and collaborators who work for the Company in contractual forms other than that of subordinate employment.

All employees undertake to act loyally in order to comply with the obligations assumed by the employment contract and the provisions of this Code of Ethics, ensuring the services that are required of them and respecting the commitments undertaken, also through an explicit declaration of full acceptance of this document.

The physical and moral integrity of Human Resources is guaranteed, working conditions that respect individual dignity and safe and healthy working environments.

Therefore, requests or threats aimed at inducing people to act against the law and the Code of Ethics, or to adopt behaviors that are harmful to the moral and personal beliefs and preferences of each person, are not tolerated.

## 6.9 Impartiality and non-discrimination

In decisions that affect relations with its stakeholders, the Company avoids any discrimination based on the age, sex, sexual inclinations, state of health, race, nationality, political opinions and religious beliefs of its interlocutors.

The organization always operates with impartiality, avoiding preferential treatment in all circumstances.

In order to ensure the full implementation of this impartiality, no form of gift or gift is permitted that could be understood as exceeding normal commercial or courtesy practices, or in any case aimed at acquiring preferential treatment in the conduct of any of the Company's activities.

The organization has long decided to use, as a form of gift or tribute, the financing of projects for the adoption and support of minors at a distance, through the intermediation of recognized associations and with the communication to the public and to the social bodies of the funded projects.

In the management of hierarchical relationships, the organization ensures that authority is exercised fairly and correctly, excluding any abuse.

## 6.10 Giveaways, Gifts, and Other Forms of Benefits

All staff who are part of the organization cannot accept gifts or other benefits related to their activities, except for a modest amount (approximately Max 50 euros).

Recipients must absolutely refrain from practices that are not permitted by law, usage or trade practice.

The company allows the bestowal of gifts only of a symbolic nature or of modest value, attributable to acts of courtesy. Any form of gift that exceeds normal commercial or courtesy practices, or in any case aimed at acquiring preferential treatment in the conduct of any business activity, is therefore strictly prohibited.

## 6.11 Prevention of corruption and management of conflicts of interest

The organization prevents any form of conflict of interest; acknowledges and respects the right of its employees, collaborators, directors, shareholders to participate in investments, business or other activities other than those carried out in the interest of the Company, provided that these activities are permitted by law and contractual provisions and compatible with the obligations assumed towards the Company.

The conflict between personal interest and that of the Company arises whenever conduct or a choice made in the workplace is capable of generating, even potentially, an unlawful advantage for oneself or one's family members, to the detriment of the superior interest of the Company.

The Compliance Function for the Prevention of Corruption has been assigned to the function, which is responsible for coordinating the management system.

It is dedicated to its mission to:

- implement the necessary controls for the monitoring of suppliers;
- promote the culture of Risk Based Thinking;
- promote the culture of Corruption Prevention;
- to improve, as far as it is concerned, the performance of the entire management system;

### **Due diligence**

In order to support and make its decision-making processes as efficient as possible, the Company carries out due diligence activities in relation to all categories of transactions, projects, activities, business partners and staff members, regardless of the level of risk that characterizes them.

By way of example, among the safeguards used by the company: supplier manual and official published data, research in adequate governmental, judicial and international sources of information on the subject; checks on public exclusion lists of organisations that have limitations or prohibitions on participating in public or government procurement drawn up by national or local governments or multilateral institutions, such as the World Bank;



## 6.12 Quality and safety of products/services

The organization pursues its mission through the offer of quality products/services, at competitive conditions and in compliance with all mandatory regulations.

The Company's style of conduct towards customers is based on availability, respect and courtesy, with a view to a collaborative and highly professional relationship. In particular, in communication with customers, the company ensures completeness, correctness and clarity of all information regarding the characteristics, contents, nature and origin of the products.

Contracts and communications to customers (including advertising messages) are and will be clear, truthful and complete.

The Company ensures the placing on the market of products that comply with national and EU laws on the subject, activating all the necessary controls for this purpose.

## 6.13 Responsibility towards the community and the environment

The organization undertakes to manage its processes with environmental protection and efficiency criteria through the identification, management, and control of its environmental aspects, as well as through the rational use of energy resources and the minimization of emissions, according to a development model compatible with the territory and the environment.

# 7. RULES OF CONDUCT

## 7.1 Partners

The organization creates the conditions so that the participation of members in the decisions of their competence is widespread and conscious.

The organization's strategies towards members are mainly aimed at:

- achieve maximum transparency towards the company's stakeholders;
- to meet the legitimate expectations of the members;
- avoid any type of transaction to the detriment of creditors;
- avoid discrimination against members on the basis of sex, race, language, religion, nationality, political opinions, personal and social conditions;
- ensure that shareholders participate fully in the exercise of the company's activities and in the governance of the company.

Likewise, it requires its members to fully comply with the rules contained in this Code of Ethics.

## 7.2 Corporate Reporting

The organization ensures the keeping of accounting records, the preparation and preparation of the financial statements, economic balances, reports, prospectuses, corporate communications in general and anything else required for its operation, in accordance with the provisions of the law, the principles and the technical standards in force.

Each operation and transaction is correctly recorded, authorized and kept track of it also through computerized systems in order to allow easy accounting entry, the identification of the different levels of responsibility and the accurate reconstruction of the operation, also to reduce the probability of interpretation errors.

## 7.3 Management of financial resources in the context of the company's activities

The operations and transactions carried out by the organization and by persons acting in the name and on behalf of the same, comply with the law, business fairness, the principles of transparency, verifiability, consistency and fairness and must be duly authorized, documented and recorded.

The Company constantly monitors the correct use of financial resources in order to prevent the commission of crimes and manages them according to criteria of transparency and traceability.

Outgoing financial transactions (payments) are carried out on the agreed deadlines directly to the intended recipients and not in cash, except in special situations such as to justify a deferral or an exception of non-performance pursuant to art. 1460 of the Civil Code.

## 7.4 Administrative management and budget

The preparation of the financial statements and any other type of accounting documentation must comply with primary and secondary national legislation, EU legislation and it is also necessary to adopt the relevant accounting standards, ensuring a true and correct representation of the company reality and management facts.

The criteria of truthfulness, accuracy, completeness and clarity of information assume a fundamental value and allow all stakeholders to make clear assessments of the company's economic, equity and financial situation.

Anyone who becomes aware of possible omissions, falsifications, irregularities in the keeping of accounts and basic documentation, or violations of the principles established by the Code of Ethics is required to inform the corruption prevention function without delay.

The aforementioned violations are subject to disciplinary relevance and are adequately sanctioned

## 7.5 Human Resources

### 7.5.1 Personnel selection

The assessment and selection of personnel to be hired is carried out on the basis of the correspondence of the candidates' profiles with those expected and the needs of the Company, in compliance with the principles of impartiality and equal opportunities for all interested parties, avoiding any form of favoritism, clientelism or nepotism. All decisions taken in the field of human resources management and development are based on considerations of merit profiles and/or correspondence between expected profiles and profiles possessed by employees. The same applies to access to different roles or assignments.

### 7.5.2 Human Resource Management

Any form of discrimination against persons is prohibited.

In the management of hierarchical relationships, authority is exercised with fairness and correctness, avoiding any abuse.

It constitutes abuse of the position of authority to request, as an act due to the hierarchical superior, services, personal favors and any behavior that constitutes a violation of this Code.

Human resources are fully exploited through the activation of the levers available to promote their development and growth.

The competent functions must therefore:

- select, hire, train, remunerate and manage employees or collaborators without any discrimination;
- create a work environment in which personal characteristics cannot give rise to discrimination;
- adopt criteria of merit, competence and in any case strictly professional for any decision relating to an employee or collaborator;
- guarantee all employees, partners, collaborators a healthy and safe working environment;
- inform all employees and collaborators of all legislative, contractual, regulatory provisions and all operational and safety practices.

### 7.5.3 Health and Safety

The organization promotes and disseminates the culture of safety, developing awareness of risk management, also through specific training, promoting responsible behavior and preserving, especially with preventive actions, the health and safety of all employees and collaborators.

All employees, collaborators, partners, are required to scrupulously comply with the rules and obligations deriving from the reference legislation on health and safety, as well as to comply with all the health and safety measures provided for by internal procedures and regulations.

#### *7.5.4 Information Management and Privacy*

The privacy of employees, collaborators, agents, partners, directors and shareholders and the confidentiality of information is protected in compliance with the relevant legislation, also through operating standards that specify the information received and the related processing and storage methods, as required by the security policy document, which all personnel are required to scrupulously comply with. Any investigation of people's ideas, preferences, sexual inclinations, personal tastes, private life and state of health is excluded.

### **7.6 Human Resources Duties**

#### *7.6.1 Obligations of conduct*

Every employee, director, partner and collaborator in any capacity is required to know the rules contained in the Code of Ethics and the reference rules that govern the activity carried out within the scope of his or her function, deriving from the law or from internal procedures and regulations.

Each employee, director, partner, agent and collaborator in any capacity must also explicitly accept their commitments deriving from this Code of Ethics, at the time of establishment of the employment relationship or first dissemination of the Code of Ethics.

In particular, each of them has the obligation to:

- know the provisions and rules contained therein and refrain from conduct contrary to them;
- contact your superiors, company contact persons in case of request for clarification on how to apply them;
- promptly report to superiors, company representatives, any news, directly detected or reported by others, regarding their possible violations or simple request for violations;
- collaborate with the structures responsible for verifying possible violations;
- adequately inform any third party with whom they come into contact in the context of their work activities about the existence of the Code of Ethics and the commitments and obligations imposed by it on external parties;
- to demand compliance with obligations that directly affect their activity;
- adopt the appropriate internal and, if within its competence, external initiatives in the event of failure by third parties to comply with the rules of the Code of Ethics.

#### *7.6.2 Information Management*

Employees, collaborators, partners, directors and shareholders are required to know the content of the security policy document and implement the provisions of the Company's policies on information security, to ensure its integrity, confidentiality and availability.

It is the obligation of every employee, collaborator, partner, partner, director to ensure the confidentiality required by the circumstances for each piece of information learned by reason of their work function.

In this regard, it is reiterated that anyone for any reason who comes into possession of information of corporate interest or relating to any stakeholder, must keep the information confidential and in no way must feel authorized to disseminate or use it outside the operational purposes for which he or she has been authorized by company management.

The confidentiality obligations, pursuant to the Code of Ethics, continue even after the termination of the employment relationship and/or contractual relationships, as the disclosure of confidential information can damage the company's activities, customers and business partners at any time.

#### *7.6.3 Conflicts of interest*

Every employee, collaborator, director, partner is required to avoid all situations and all activities in which a conflict with the interests of the Company may arise or that may interfere with his or her ability to take decisions in the best interest of the company and in full compliance with the rules of the Code of Ethics.

Any situation that may constitute or determine a conflict of interest must be promptly communicated by each employee, collaborator, director, partner to his or her superior or company representative.

In particular, all employees, collaborators, directors, partners are required to avoid conflicts of interest between personal and family economic activities and the tasks they hold within the structure to which they belong.

By way of example, but not limited to, the following situations result in conflicts of interest:

- perform functions of or have economic or financial interests with suppliers, customers, competitors or business partners;
- use your position in the Company or the information acquired in your work in a way that may create a conflict between your personal interests and the interests of the Company;
- carry out work activities, of any kind, at customers, suppliers, competitors.
- accept or offer money, favors or benefits from persons or companies that are or intend to enter into business relationships;

#### *7.6.4 Use and protection of assets owned by the Company*

Every employee, collaborator, agent, partner, partner, director is required to operate with due care and diligence to protect the assets owned by the Company, through responsible conduct and in line with the operating procedures set up to regulate their use, documenting, where appropriate, their use.

Each employee, collaborator, agent, partner, partner, director is responsible for the protection of the resources entrusted to him and has the duty to promptly inform the structures in charge of any threats or events harmful to the Company itself or its assets.

In particular, employees, collaborators, partners, partners, directors are required to:

- avoid improper use that may cause undue costs, damage or reduction of efficiency or in any case contrary to the interest of the Company;
- when using the means of communication made available by the Company (PCs, landlines and mobile phones, network connection tools, etc.), take all necessary precautions to prevent any form of use contrary to the law and internal regulations; in the event of use of the means in question outside the purposes provided for in the contract, it is necessary to have a formal authorization from the Company;
- scrupulously adopt the provisions of the policies, the Presidential Decree and internal procedures, in order not to compromise the functionality, protection and security of the Company's IT systems, equipment and plants;
- always operate in compliance with the safety regulations provided for by law and internal procedures, in order to prevent possible damage to property, people or the environment;
- scrupulously follow the indications of the company signage in terms of access and use of personal protective equipment;
- use the Company's property, of any type and value, in compliance with the law, internal regulations, and the principles of this Code of Ethics;
- use the Company's assets exclusively for purposes connected and instrumental to the exercise of work; in any case, it is prohibited, except when provided for by specific regulations or company agreements, the use or transfer of the goods themselves by third parties or to third parties, even temporarily;
- operate, as far as possible, in order to reduce the risk of theft, damage or other threats to the assets and resources assigned or present, informing the functions in charge in a timely manner in the event of abnormal situations.

## **7.7 Customers**

### *7.7.1 Behavior style towards customers*

The Company's style of conduct towards customers is based on availability, respect and courtesy, with a view to a collaborative and highly professional relationship.

The organization pursues its mission through the offer of quality products/services, at competitive conditions and in compliance with all the rules put in place to protect fair competition.

Employees, collaborators, partners, partners and directors, etc., are obliged to:

- to provide, with efficiency, courtesy and timeliness, within the limits of the contractual provisions, high quality products or services, which meet the reasonable expectations and needs of the customer;
- provide, where necessary and in the manner and in the forms provided for by company policies, accurate and comprehensive information about the Company's products or services, so that the customer can make informed decisions;
- meet customer expectations in terms of honesty, transparency and full compliance with the law and contractual agreements;
- To be truthful in advertising or other communications.

Relations with customers are inspired by the principles of fairness, good faith, transparency, professionalism and efficiency. The goal of ever higher customer satisfaction depends on:

- the constant search for the right balance between cost-effectiveness and quality of the service provided;
- from the preparation of staff so that they can cope with requests with competence and kindness;
- by the explicit rejection of any relationship with criminal or mafia organizations and with subjects who resort to behavior contrary to the law.

## 7.8 Suppliers

### 7.8.1 Selection of suppliers and contractors

The selection of suppliers and contractors and the determination of purchase conditions are based on objective parameters, such as quality, convenience, price, capacity, efficiency, ethics, and compliance with the law.

For the company, therefore, reference requirements are:

- the professionalism of the interlocutor;
- the availability, duly documented, of means, including financial means, organised structures, project capacities and resources, know-how, etc.;
- the existence and effective implementation of quality, safety and environmental management systems;
- the maintenance of environmentally friendly conduct and sustainability policies;
- the maintenance of conduct that does not negatively affect the image and good name of the company.

In procurement, procurement and, in general, the supply of goods and services:

- adopts, in the selection of the supplier, the evaluation criteria provided for by the existing procedures, in an objective and transparent manner, requesting before making the choice the documentation certifying the technical and professional skills, the fulfilment of social security and legal obligations and the equipment in terms of technical equipment and safety in the workplace;
- does not preclude anyone, in possession of the required requirements, from competing in the stipulation of contracts, adopting objective and documentable criteria in the choice of candidates;
- ensures sufficient competition for any tender, or request for tenders; any derogations must be authorized and documented;
- observes the contractual conditions and verifies full compliance with them over time;
- maintains a frank and open dialogue with suppliers, in line with good business practices;
- observes and demands compliance with all the obligations imposed by current legislation, on the environment, safety, public procurement, contribution and tax payments;
- ensures the transmission of all the information necessary to ensure the performance of services in full compliance with mandatory regulations.

Suppliers are required:

- compliance with the law in general;
- compliance with the principles of this Code of Ethics and, more generally, with the Organisation and Management Model pursuant to Legislative Decree 231/2001;

- compliance with current labour legislation, with particular attention to child labour and the provisions of occupational health and safety and environmental legislation;
- not to support in any way, either directly or indirectly, mafia or terrorist associations.
- Compliance with anti-corruption and antitrust principles

### 7.8.2 Protection of ethical aspects in supplies

With a view to conforming the procurement of goods and services to the ethical-environmental principles of reference, the organization may require, for particular supplies, social and/or environmental requirements. To this end, specific clauses may be prepared in the individual contracts.

## 7.9 Environment and Safety

The organization considers issues related to the environment and worker safety to be of high importance. To this end, in the management of business activities, the Company takes into account environmental protection and energy efficiency, pursuing the improvement of health and safety conditions at work. In particular, also through the active collaboration of its employees, collaborators, agents, administrators, partners, partners, external service providers:

- promotes and implements any reasonable initiative aimed at minimising risks and removing causes that may jeopardise the safety and health of people, excluding any form of exception or derogation from the internal procedures adopted for this purpose;
- it pays continuous attention and commitment to improving its environmental performance, minimizing the negative impact on the environment and operating a conscious and responsible use of natural resources;
- collaborates with its stakeholders, both internal (e.g. employees) and external (e.g. institutions), to optimize the management of profiles relating to Health, Safety and Environment issues;
- maintains high standards of safety and environmental protection in compliance with current legislation;
- adopts a policy of using products compatible with the protection of the environment and the safety of workers.
- transmits and requests to receive all the information, documentation and certifications necessary to ensure total compliance with mandatory legislation, with particular reference to safety and hygiene in the workplace, environmental protection, correct management of employment relationships.

Decisions on health and safety at work are taken by the Company on the basis of certain fundamental principles and criteria, set out in the relevant international and national regulations and in particular in Legislative Decree 81/2008 and ss.mm. These principles and criteria can be summarized as follows:

- avoid risks;
- assess risks that cannot be avoided;
- combating risks at source;
- adapting work to people, for example in the design of workplaces, in the choice of equipment and working methods;
- take account of the degree of technical development;
- replace what is dangerous with what is not dangerous or less dangerous;
- plan prevention, aiming at a coherent whole that integrates technique, work organization, working conditions, social relations, and the influence of factors in the working environment;
- prioritise collective protection measures over individual protection measures;
- give adequate instructions to workers;
- prepare an accurate training and information system to and from employees, collaborators, agents, partners, administrators, corporate bodies, partners, contractors, suppliers in general;
- guarantee, in any case, the adoption of all measures which, according to the particular nature of the work, experience and technique, are necessary to protect the physical integrity and moral personality of workers.

### 7.10 Collectivity

The organization is aware of the effects of its activities on the reference context, on economic and social development and on the general well-being of the community and pays attention, in its work, to reconcile its interests.

The organisation considers that dialogue with stakeholders is of strategic importance for the proper development of its business and establishes, where possible, a stable channel of dialogue with associations representing its stakeholders, with the aim of cooperating in respect of mutual interests.

### 7.11 Relations with public institutions

Relations with public, local, national and international institutions are reserved exclusively for the functions and responsibilities delegated to them.

The organization undertakes to establish, without any kind of discrimination, stable channels of communication with all institutional interlocutors at local, national and community level.

These relationships must be oriented towards criteria of maximum transparency and correctness, rigor and consistency, avoiding collusive attitudes.

### 7.12 Relations with political and trade union organizations

The organization does not provide any contribution to political and trade union parties, movements, committees and organizations, their representatives and candidates.

### 7.13 Relations with non-profit organizations

The organization welcomes and, where appropriate, provides support to social and cultural initiatives aimed at the promotion of the person and the improvement of the quality of life, subject to the approval of the company managers.

### 7.14 Relations with the mass media and dissemination of information

Relations with the press, the media and information and, more generally, external interlocutors, must be maintained only by persons expressly delegated to do so, in accordance with the procedures and policies adopted by the Company.

External communications follow the guiding principles of truth, fairness, transparency, prudence and are aimed at promoting knowledge of the Company's company policies and programs and projects.

Relations with the mass media are based on this principle and are reserved exclusively to the Chairman, who manages them in accordance with the policies adopted by the Company.

Employees, collaborators, directors, shareholders may not provide information externally, nor undertake to provide it, without the authorization of the Presidency.

In no way or form may employees, collaborators, agents, directors, partners offer payments, gifts, or other benefits aimed at influencing the professional activity of mass media functions, or that can reasonably be interpreted as such.

### 7.15 Relations with clients

The organization in the context of relations with customers guarantees compliance with the principles of fairness, honesty and transparency in commercial and contractual negotiations.

The company is constantly committed to ensuring an increasingly high degree of customer satisfaction.

### 7.16 Relations with Users

The organization carries out its activities pursuing the goal of maximum user satisfaction. All the company's operators are committed to ensuring a high quality service both from a purely technical and operational point of view and from the point of view of relations with users.

The organization also guarantees, through the public relations offices, adequate and exhaustive information to users about the methods of providing services.

### *7.17 Relations with Competitors*

The organization strongly prohibits the use of violence or fraudulent means in order to prevent or disrupt the exercise of an industry or trade. In its relations with competitors, the company, in fact, avoids and condemns any act of unfair competition and undertakes not to engage in conduct that could damage other operators aware of the serious detrimental effects deriving from the violation of laws protecting competition, including long-lasting reputational damage.

### *7.18 Public Administration*

Relations relating to the Company's activities with public officials or persons in charge of public services (who operate on behalf of the central and peripheral Public Administration, or legislative bodies, EU institutions, international public organisations and any foreign State), with the judiciary, with public supervisory authorities and other independent authorities, as well as with private partners who are concessionaires of a public service, must be undertaken and managed in absolute and strict compliance with the laws and regulations in force, the principles set out in the Code of Ethics, so as not to compromise the integrity and reputation of both parties. To this end, the assumption of commitments with Public Administrations and Public Institutions is reserved exclusively to the functions in charge and authorized that will carry them out in due compliance with the laws and the principles of the Code of Ethics.

The organization prohibits its employees, collaborators, partners, partners, directors or representatives and, more generally, all those who work in its own interest, in its own name or on its own behalf, from accepting, promising or offering, even indirectly, money, gifts, goods, services, services or undue favors (including in terms of employment opportunities) in relation to relationships with public officials, persons in charge of Public Services or employees, in general, of the Public Administration or other Public Institutions, or private subjects, to influence their decisions, with a view to more favourable treatment or undue performance or for any other purpose.

Any employee, collaborator, agent, partner, director who directly or indirectly receives requests or offers of money or favors of any kind (including, for example, gifts or gifts of no small value) unduly formulated to those, or by those, who work on behalf of The Organization in the context of relations with public officials, public service officers or employees in general of the Public Administration (Italian or other foreign countries) or other Public Institutions, or with private entities (Italian or foreign), must immediately report to the internal function responsible for taking the consequent measures.

### *7.19 Financing management.*

The organization, in requesting and managing facilitations, contributions and funding of any kind obtained from the State, from other public bodies or from the European Union, requires its employees, collaborators and administrators to respect the principles of legality, transparency and fairness.

To this end, the organization and its employees, collaborators, partners and, directors and representatives in any capacity must:

- operate, without any kind of discrimination, through the channels of communication provided for this purpose with institutional interlocutors at national and international, community and territorial level;
- represent the interests and positions of the Company in a transparent, rigorous and consistent manner, avoiding collusive attitudes;
- avoid falsification and/or alteration of statements or documentary data in order to obtain an undue advantage or any other benefit for the Company and avoid allocating public funds to purposes other than those for which they were obtained;
- to carry out a scrupulous check of the data contained in the declarations addressed to public bodies;

In any case, the company and its employees, collaborators, partners, directors undertake to report any news of conduct contrary to the principles set out above of which they become aware