



# CODE OF ETHICS



*Code of Ethics (edition 2023)*

*Adopted by the Board of Directors on 12/04/2021*

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## 1 INTRODUCTION

This Code of Ethics expresses the ethical commitments and responsibilities in the performance of business activities by the employees of Technital S.p.A. and its subsidiaries, whether executives or employees of any sort of these enterprises<sup>1</sup>.

The contents of the present document have been inspired by the Code of Ethics and Integrity Management System of FIDIC and by the Organization, Management and Control Model of Technital (pursuant to Legislative Decree 231/2001).

### 1.1 Validity and application of the Code

The principles and provisions contained in this Code of Ethics have as their main recipients the Board of Directors, the Board of Statutory Auditors and the supervisory bodies as specified at the company's Chamber of Commerce. Technital has identified a Supervisory Body (Organismo di Vigilanza) to deal with all matters relating to the Code of Ethics including all violations of the rules set out therein. The same principles and provisions apply, although subordinately, to managers, employees and collaborators linked to the Company by contractual relationships of any nature, including occasional and/or temporary contracts. Technital requires that all companies affiliated or in which it holds a share, as well as its suppliers and partners, behave in accordance with the general principles of this Code. The Code of Ethics is valid both in Italy and abroad, albeit in consideration of the cultural, social and economic diversity of the various countries in which the Company operates.

### 1.2 Relations with the Organization, Management and Control Model pursuant to Legislative Decree n. 231/2001

In addition to this Code of Ethics, Technital has adopted the Organization, Management and Control Model pursuant to Legislative Decree 231/01 (Italian law for the prevention of the risk of crime in relation to business activities).

The Code of Ethics has a general scope and represents an instrument adopted independently by the Company, even if it recalls principles of conduct that are relevant for the purposes of the Model.

This Code of Ethics, for the purposes of Legislative Decree 8 June 2001, n. 231 (Legislative Decree 231/2001), complies with the requirements provided by the “Guidelines for the construction of organization, management and control models pursuant to Legislative Decree 231/2001” drawn up by Confindustria.

In this regard, while the Code of Ethics addresses the general behavior of the Recipients of the same, the Organization, Management and Control Model, understood as an instrument with specific purposes and relevance pursuant to Legislative Decree 231/01, meets the specific requirements contained in the Decree, aimed at preventing the commission of particular types of crimes for facts which, apparently committed for the

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<sup>1</sup> Hereinafter, the term “Technital” refers to Technital S.p.A. and to all branches and subsidiaries.

benefit of the Company, may give rise to administrative liability for a crime on the basis of the provisions of the same Decree.

## 2 GENERAL PRINCIPLES<sup>2</sup>

The following principles represent an indispensable and fundamental asset of Technital, which bases its development on a solid reputation faithful to these values.

Recipients are required to act in strict compliance with these principles in carrying out their activities.

### 2.1 Responsibility to the society and the consulting industry

Technital accepts the responsibility of the consulting industry to society; seeks solutions that are compatible with the principles of sustainable development; at all times uphold the dignity, standing and reputation of the consulting industry; seeks solutions that have direct and indirect influence on the conditions, economic and social development and general wellbeing of the community, as well as the importance of obtaining social acceptance in the communities where it operates; promotes investment activities in an environmentally sustainable manner, respecting local and national communities while supporting initiatives of cultural and social value in order to further improve its reputation and acceptance by society at large.

### 2.2 Competence

Technital shall maintain knowledge and skills at levels consistent with development in technology, legislation and management, and apply due skill, care and diligence in the services rendered to the client and perform services only when competent to perform them.

### 2.3 Integrity and impartiality

Technital shall act at all times in the legitimate interest of the client and provide all services with integrity and faithfulness. Under no circumstances, the pursuit of the interests of Technital can be used as a justification for dishonest conduct.

### 2.4 Fairness to others

Technital shall promote the concept of “Quality-Based Selection” (QBS) and it does not intend neither carelessly nor intentionally to do anything to damage the reputation or business of others; neither directly nor indirectly attempt to take the place of another consulting engineer, already appointed for a specific work; guarantee the confidentiality of the information in its possession, and refrains from searching for confidential data, except in cases where express and informed authorisation has been granted, and in compliance with legislation currently in force; guarantee that Technital’s employees are prohibited from using confidential information for purposes not tied to the exercise of their activities.

### 2.5 Corruption

Technital repudiates any act of corruption such as, for instance, offer and/or remuneration of any kind which in perception or in effect either a) seeks to influence the process of selection or compensation of consulting

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<sup>2</sup> The general principles are inspired by the FIDIC Code of Ethics, by 1948 UN Universal Declaration of Human Rights and the European convention on Human Rights.

engineers and/or their clients or b) seeks to affect the consulting engineer's impartial judgement. Technital shall fully cooperate with any legitimately constituted investigative body which makes inquiry into the administration of any contract for services or construction.

## 2.6 Human resources

Technital guarantees the physical and psychological integrity of its employees, working conditions that respect the dignity of the individual, regulations for conduct based on good manners, and workplaces that are safe and healthy; to ensure that there are no episodes of intimidation, mobbing or stalking in the workplace: to avoid all forms of discrimination based on the age, gender, sexual preference, health, race, nationality, political opinions or religious beliefs of its interlocutors; to ensure that the authority is exercised in a fair and correct manner, without abuse of any form; that authority shall not lead to any exercise of power that proves detrimental to the dignity or independence of any employee, and that decisions involving the organisation of working activities shall safeguard the value of the employees. Finally, Technital considers its employees an indispensable factor in its success and promote the value of its human resources.

## 2.7 Transparent and complete information

Technital shall require to its employees to supply complete, transparent, understandable and accurate information, in such a way that, in establishing their relations with Technital, the stakeholders are able to reach independent, informed decisions regarding the interests involved, as well as the alternatives and any significant consequences.

## 2.8 Environmental protection

Technital shall promote the environment as a primary resource that Technital is committed to defend; seek to strike a balance between economic initiatives and vital environmental concerns in consideration of the rights of future generations; improve the environmental and landscape impacts of its activities; prevent risks to the population and the environment, not only by complying with regulations, but also by taking into account the development of scientific research and the best practices in the sector.

## 3 CODE OF CONDUCT

### 3.1 Criteria of conduct in relations with Shareholders

#### *Corporate Governance*

The system of Corporate Governance adopted by Technital is inspired by the highest standards of transparency and correctness in the management of the company.

#### *Internal control*

The Company defines policies on governance and responsibility. The Board of Directors is in charge of the company's performance. A common management structure governs quality, safety and environment and the Company has developed internal policies for: business conduct, data protection, dignity and equality at work, and the appropriate use of information technologies. All these issues are reviewed regularly and updated to reflect changes in the legislation, emerging good practice, and business needs.

Internal control rules for production are set in order to monitor activities and to undertake corrective actions whenever needed for organizational reasons.

A Project Manager is appointed for the development of each project. The Project Manager's goal is to develop the production activities of the project assigned to him according to the standard required by the Company, to the satisfaction of the Client and within the assigned budget.

The overall activities lay on a certified Quality System ISO 9001:2015 Quality System Management and the company is also certified by ISO 14001: 2015 Environmental Quality Management and by ISO 45001: 2018 Occupational Health and Safety.

#### *The Accounting and Balance Auditing*

The Board of Directors has primarily the responsibility for the company external financial reporting functions in conjunction with the Administrative Department which guarantees the integrity and provision of accounting information.

During such process, the Board of Directors takes advantage of the control exerted by the Head of the Administrative Department, of the external Auditing Company and of the Board of Statutory Auditors.

### 3.2 General criteria of conduct in relations with Parties other than Shareholders<sup>3</sup>

The following points are applied to all the subsequent criteria of conduct in relations to parties other than shareholders.

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<sup>3</sup> Other parties are parties other than shareholders such as: employees, clients, sub-consultant, suppliers, commercial partners, community, public administration.



### *Information processing*

Information on stakeholders is processed by Technital with full respect for the confidentiality and privacy of the parties involved.

To this end, specific policies and procedures for the protection of information are applied and kept constantly up to date. In particular, Technital:

- has established an organisational structure for the processing of information that ensures the respect of the law in force on privacy;
- classifies the information according to levels of sensitivity and adopts appropriate countermeasures for each phase of processing;
- demands that the parties involved in the processing of the information sign confidentiality agreements.

### *Gifts, free articles and benefits*

Any form of gift which exceeds or can be construed as exceeding normal commercial practices or courtesy, or which is in any way meant to obtain favourable treatment in the pursuit of any activity tied to Technital, is prohibited. Specifically, all forms of gifts to public officials in Italy or abroad, auditors, Directors of Technital and its subsidiaries, members of the Board of Statutory Auditors or to their family members, capable of influencing their independence of judgement or obtaining any type of advantage are prohibited.

This rule, to which there shall be no exceptions, even in those countries where offering gifts of value to commercial partners is a custom, covers gifts promised and/or offered or received. The term “gift” refers to any type of benefit (participation in conferences free of charge, the promise of a job-offer, etc.). In all cases, Technital refrains from practices not permitted by the law, by commercial practice or by ethical Codes (if known) of the companies or entities with which it has relations. The free articles offered by Technital (always of modest commercial value) are not considered a “gift” if bearing the name and/or the logo of Technital as they are meant to promote the company’s brand image.

With the exception of those of modest value, the gifts offered must be handled and authorised as per company procedures and must be documented. Technital’s employees or associates that receive unauthorised free gifts or benefits must inform the Supervisory Body (Organismo di Vigilanza) of Technital, which will then assess the appropriateness thereof.

### *No ethical-acts in conducting relations with Parties other than Shareholders*

The present chapter is to highlight a number of no-ethical acts which must be avoided in the relations with Parties other than Shareholders. It is therefore a common ground to be considered as general criterion regardless whether relations are with Employees, Clients, Sub-Consultant, Suppliers, Commercial Partners, Community or Public Administration.

The following activities are considered, for example, unethical: collusion, fraud, corruption, concussion, extortion, coercion, conflict of interest.

Undertaking any of the no-ethical activities mentioned above and also activities falling within the current/legal meaning of the above definitions and also activities that are considered of the same kind or similar, is considered an infringement of the rules of the present Code of Ethics and it will be sanctioned accordingly.

### *External communications*

Technital's communications to its stakeholders (including those made through technical articles, press article, and in general the mass media) are formulated in respect of the right to information. Under no circumstances is the communication of false or biased information or comments permitted.

All communications comply with the law, rules and practices of professional conduct and must be made in a clear, transparent and timely manner, safeguarding, among other elements, price-sensitive information and industrial secrets.

## 3.3 Criteria of conduct in relations with Employees<sup>4</sup>

### *Recruitment*

The evaluation of personnel to be hired is performed on the basis of the degree to which the candidate's profile corresponds to the characteristics being sought and to the company's needs, and in compliance with the principle of equal opportunity for all the individuals involved.

The information requested is strictly related to the verification of the possession of the professional and psycho-attitudinal characteristics being sought, with the utmost respect for the candidate's private sphere and opinions.

Within the limits of the available information, Technital takes appropriate measures to avoid instances of favouritism, nepotism or cronyism during the selection and hiring phases.

### *Establishment of the employment relationship*

The personnel is hired with regular employment contracts. No form of irregular employment is tolerated. At the time the employment relationship is established, each employee receives accurate information regarding the characteristics of the function and the tasks to be performed; rules of employment and salary elements; regulations and procedures to be respected.

### *Human resources management*

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<sup>4</sup> "employee" falls into group of parties other than shareholders for which the General Criteria of Paragraph 3.2 are also applied.

Technital avoids all forms of discrimination against its employees. During the personnel management and development phases, as well as in the selection process, the decisions taken are based on whether the required job profile corresponds to the employee's characteristics (in the case of promotion or transfer, for example) and/or on considerations of merit (for example, the awarding of incentives on the basis of the results achieved). Access to roles and positions is also determined by considering expertise and ability. Flexible forms of work organisation are established to facilitate the management of periods of maternity, as well as child care in general, wherever such an approach is compatible with the overall efficiency of work.

The employees of Technital are free to join trade union associations and to use the tools provided for in the national class employment contracts without this leading to discrimination within the company itself.

The evaluations of employees are performed in a broad manner, with the involvement of superiors and, to the extent it proves possible, those individuals who have had dealings with the person being evaluated.

Within the limits of the available information and respecting the individual's privacy, Technital seeks to prevent all forms of nepotism (for example, by excluding the possibility of direct hierarchical relationships between employees with family ties).

Technital never made use of, don't make use of and don't intend to use child labour. All the stakeholders are informed of the strict application of this rule which can lead to contractual termination in case of infringement.

#### *Valorization and training of human resources*

The Managers deploy and optimise all the professional skills present inside the company by using all available means to foster the development and growth of their employees (for example, job rotation, mentoring by expert personnel and the handling of positions leading to greater responsibility).

In the course of the above activities, it is particularly important that managers of reference communicate all the strengths and weaknesses of the professionals in order for the latter to be able to improve their skills through focused training.

Technital places both in-house and distance information and training instruments at disposal of the professionals for the purpose of optimising specific skills and maintaining the professional value of the personnel.

#### *Management of the working time of employees*

Each manager of reference is required to optimise the working time of the employees by requiring that their performance coincides with the exercise of their assigned tasks and with work organisation plans.

Requests for services, personal favours or any other forms of conduct that violate the present Code of Ethics, but which are presented as if they were acts that must be carried out for a superior, constitute an abuse of a position of authority.

### *Involvement of employees*

The involvement of employees in the performance of their work is ensured in various ways, including the arrangement of opportunities where they can take part in discussions and decisions that serve to achieve corporate goals. Employees must take part in such exercises in a spirit of cooperation and independent judgment.

By listening to various points of view, and while keeping in mind the company needs, the managers can formulate the final decisions. The employees must, however, always play a role in the implementation of the planned activities.

### *Changes in the organisation of the work*

In cases where the work activities are reorganised, the value of human resources must be safeguarded by undertaking, wherever necessary, training and/or professional retraining activities.

### *Health and safety*

The company guarantees total compliance with the regulations concerning health and safety in the workplace, not only through the Italian Legislative Decree No. 81/2008 but also on the basis of other regulations in force in the countries where Technital operates, in order to analyze, monitor, prevent and manage any risk associated with professional activities.

### *Safeguarding of privacy*

The privacy of the employees is safeguarded through the utilisation of standards that specify the information that Technital requests from them, together with the procedures under which such information is processed and preserved. Investigations into the personal beliefs, preferences and tastes of the employees, or their private lives in general, are not allowed. The above standards also prohibit the communication or disclosure of personal data without the prior consent of the interested party, except in the cases provided for under law. They also set rules for the control, by each employee, of the measures protecting privacy.

### *Integrity and protection of individuals*

Technital undertakes to safeguard the moral integrity of its employees, ensuring their right to working conditions that respect the dignity of the individual. Bearing this in mind, Technital protects its employees from acts of psychological violence and opposes any attitudes or form of behaviour that results in discrimination or injury of the individual or of his or her convictions or preferences (for example, in case of insults, threats, isolation or excessive invasion of privacy, as well as professional limitations).

Sexual harassment is not permitted, nor are any forms of behaviour or speech which might hurt the feelings of individuals (for example, the exposition of images with explicit sexual references or insistent and continual sexual allusions). A Technital employee who believes that he or she has been subjected to harassment or discrimination for reasons linked to age, gender, sexual preferences, race, health conditions, nationality, political

opinions and religious beliefs etc. he or she may report the fact to the Supervisory Body (Organismo di Vigilanza) of the company, which shall evaluate whether a violation of the Code of Ethics has occurred.

### *Duties of employees*

The employees must act in good faith to meet the obligations undertaken when signing their contract of employment, as well as the provisions of the Code of Ethics, fulfilling the tasks requested. They are also required to report through the appropriate channels any situations that they deem to constitute violations.

### *Management of information*

In order to guarantee the integrity, confidentiality and availability of information, the employees must know and enforce corporate policies on information security. In drawing their documents, they are required to utilise clear, objective and exhaustive language, allowing to any controls by colleagues, superiors or external parties authorised to make such requests.

### *Conflicts of interest*

All Technital employees are required to avoid situations which can lead to conflicts of interest and to refrain from personally taking advantage of business opportunities that they may learn of when performing their functions.

Should even the appearance of a conflict of interest arise, the employee is required to notify the Supervisory Body (Organismo di Vigilanza) of the company, which will examine each individual case to evaluate whether there is a conflict. The employee is also required to provide information regarding the activities performed outside working hours in the event that these may appear to be in a conflict of interest with Technital.

### *Use of company resources*

Each employee is required to make every effort to safeguard company assets by acting responsibly and in compliance with the operating procedures established to regulate their use, by reporting their use in a precise manner.

Each employee is responsible for protecting his or her assigned resources and is required to report immediately any threats or events that might prove damaging to Technital and to notify the functions in charge of such matters.

Regarding computer applications, each employee is required to comply carefully with the company security policies in order to avoid compromising the functional efficiency and protection of IT systems; to refrain from sending e-mail messages that are threatening or insulting, that contain vulgar language or inappropriate comments which might offend people and/or damage the corporate image; to not browse Internet sites whose contents are improper and offensive.

### 3.4 Criteria of conduct in relations with Clients<sup>5</sup>

#### *Impartiality*

Technital undertakes not to arbitrarily discriminate against its Clients.

#### *Contracts and communications to Client*

Contracts and communications to Technital's Clients must be:

- clear and simple, formulated in a language as close as possible to that normally used by the parties (for example, by avoiding clauses purposely expressed in an unclear way and understandable only by experts, by illustrating each cost clearly);
- comply with current regulations, without resorting to elusive or improper practices (such as, for example, the use of vexatious or unfair contractual clauses);
- complete, so as not to overlook any element of relevance to the client's decision.

The purposes and recipients of the communications determine, from time to time, the choice of contact channel (telephone, e-mail) most suitable for the transmission of the contents, and undertaking not to use misleading or untruthful advertising tools. Finally, Technital monitors the timely communication of all information regarding:

- any contract modifications,
- any variations in the economic or technical conditions for the provision of services and/or sales of products, and
- the outcome of evaluations performed in compliance with the standards required by the regulatory authorities.

#### *Conduct of employees*

The Technital's conduct in dealing with Client is based on availability, respect and courtesy, with a view to a collaborative and highly professional relationship. Technital undertakes to limit the formalities which its Clients are required to fulfil and to adopt payment procedures that are simple, secure and, whenever possible, computerised and performed without additional charges.

#### *Control of quality and of Client satisfaction*

Technital undertakes to guarantee adequate quality standards for the services/products offered, on the basis of pre-established levels, and to periodically monitor the results in terms of perceived quality.

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<sup>5</sup> "clients" falls into group of parties other than shareholders for which the General Criteria of Paragraph 3.2 are also applied; the definition "clients" is also used instead of "potential clients" intended as clients and contracting authority with which Technital is bidding and/or negotiating a contract and/or approaching in order to get service contract.

### *Involvement of Clients*

Technital undertakes to always respond to suggestions and complaints from the Clients by means of appropriate and timely systems of communications. Technital is responsible for informing Clients of the receipt of their communications and for providing a rapid and fully comprehensive response.

### 3.5 Criteria of conduct in relations with Sub-consultants/Suppliers<sup>6</sup>

#### *Choice of sub-consultant/supplier*

The acquisition of external expertise and purchasing processes are to be managed in order to obtain the maximum competitive advantage for Technital while granting equal opportunity to all sub-consultant/suppliers. Besides the price, the processes are oriented towards and indispensable and mutual loyalty, transparency and collaboration.

In particular, Technital employees assigned to these processes are required to:

- not preclude anyone in possession of the prerequisites from the possibility of presenting offers for contracts and to adopt objective and transparent criteria subject to documentation;
- ensure a sufficient level of competition in every tender with a suitable number of bidders.

The prerequisite for the sub-consultant/supplier choice are to include the following besides the specific competence:

- an appropriately documented availability of resources, including financial assets, plus organisational structures, planning capabilities and resources, know-how etc.,
- the existence and effective implementation of adequate corporate quality systems (for example, ISO 9001, ISO 14001, ISO 45001, SA 8000),
- compliance with health and safety laws.

In any circumstances, if in the performance of its activities on behalf of Technital a sub-consultant/supplier should act in a manner that is inconsistent with the general principles of the present Code of Ethics, Technital is entitled to take all appropriate action, including the preclusion from any future opportunities of collaboration with such sub-consultant/supplier.

#### *Integrity and independence in relations*

Technital's relations with sub-consultant/suppliers are governed by common principles and are subject to constant monitoring by Technital. The signing of a contract with a sub-consultant/supplier must always be

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<sup>6</sup> "sub-consultants" and "suppliers" fall into group of parties other than shareholders for which the General Criteria of Paragraph 3.2 are also applied.

based on extremely clear and transparent relationships. Furthermore, the process of procurement should be counting on a proper capability of monitoring the services provided by the sub-consultant/supplier.

### 3.6 Criteria of conduct in relations with the Commercial Partners<sup>7</sup>

Technital selects and collaborates with commercial partners, both in Italy and abroad, who guarantee adequate reputational standards and who manage their business in compliance with current national and international regulations.

Partners are required to comply with the provisions contained in this Code of Ethics in the context of their commercial relations with Technital. In particular, commercial partners are forbidden, both in Italy and abroad, to carry out, collaborate or give rise to behaviors that, taken individually or collectively, directly or indirectly, integrate corruption crimes or may expose to conflicts of interest. Technital respects and requires its partners to comply with national and international regulations regarding the prevention of money laundering and the fight against terrorism. Technital respects and requires its partners, including their suppliers or additional partners, to comply with the regulations in force with respect to offices or residences in countries considered non-cooperative by the GAFI or with subsidized taxation (so-called black list countries).

### 3.7 Criteria of conduct in relations with the Community and Public Administration<sup>8</sup>

#### *Environmental Policy and Strategy*

Technital's commercial activities are managed in full compliance with current legislation on environmental protection.

Environmental protection is a corporate priority and corporate strategies must take into account any development of processes that show increasing attention to environmental safety.

Participation in risk prevention and environmental protection processes is part of the duties of the Recipients.

#### *Relations with the Public Administration*

Relations with the Public Administration, necessary for the management of company activities, must not create conflicts of interest.

Relationships must be based on the utmost transparency, clarity, correctness and such as not to lead to partial, distorted, ambiguous or misleading interpretations by the private or public institutional subjects with whom relations are maintained for various reasons.

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<sup>7</sup> "commercial partner" falls into group of parties other than shareholders for which the General Criteria of Paragraph 3.2 are also applied.

<sup>8</sup> "community" and "public administration" fall into group of parties other than shareholders for which the General Criteria of Paragraph 3.2 are also applied.



The Company undertakes to ensure compliance with current legislation in any dialogue with the Public Administration, and not to offer, directly or through intermediaries, sums of money or other undue benefits to Public Officials or Public Service Officers in order to influence their activities in the exercise of their functions.

The Company undertakes to scrupulously comply with the rules established by the Authorities for compliance with current legislation in the sectors connected to its business.

The Recipients must comply with these criteria of conduct, comply, as far as they are concerned, with the requests of the regulatory or supervisory bodies and provide their support with transparency and availability during the inspection activities.

#### *Economic relations with political parties, trade unions and associations*

Technital does not make contributions, either directly or indirectly in any form, to political parties, movements or committees, trade union organizations, their representatives and / or candidates.

The Company also refrains from exerting direct or indirect pressure on political representatives. All Recipients are required to comply with these criteria of conduct.

#### *Institutional relations*

Any relationship with Italian or international institutions is exclusively attributable to forms of communication aimed at evaluating the implications of the legislative and administrative activity towards Technital, responding to informal requests and acts of inspection (queries, rulings, etc.), or in any case to disclose the position on issues relevant to Technital.

To this end, Technital undertakes to:

- establish, without any form of discrimination, stable channels of communication with all institutional interlocutors at international, European, national and local level;
- represent the interests and positions of subsidiaries in a transparent, rigorous and consistent manner, avoiding collusive behavior.

#### *Contributions and sponsorships*

The Company may adhere to requests for contributions limited to proposals from non-profit organizations and associations on condition that they have a high cultural, beneficial or social value.

Sponsorship activities, potentially relating to sports, environmental, cultural or artistic themes, can only be used for initiatives proposed by subjects of adequate credibility, which present characteristics of quality and originality.

Requests for contributions or sponsorships must be authorized by the Board of Directors in compliance with current company procedures.

The Recipients are required to comply with these criteria of conduct.

## 4 VIOLATIONS AND CONTROL OF THE EFFECTIVE APPLICATION OF THE CODE OF ETHICS

### 4.1 Control over the Code of Ethics

The Supervisory Body (Organismo di Vigilanza) is responsible for monitoring and controlling the effective application of the Code of Ethics.

This Supervisory Body, as defined in the Organization, Management and Control Model pursuant to Legislative Decree 231/01 adopted by the Company, in addition to the specific functions indicated in the Model, is assigned the task of verifying compliance with the Code of Ethics, of receiving and analyze any reports of violation of the Code and communicating to the Board of Directors the opportunity to update it.

### 4.2 Violations

In the event of violations of the provisions of the Code of Ethics, the Company adopts disciplinary measures against those responsible for the violations, where deemed necessary for the protection of corporate interests, in compliance with the current regulatory framework.

Compliance with the Code of Ethics must be considered an essential part of the contractual obligations of the Company's employees, pursuant to and for the purposes of the provisions of art. 2104 and ss. of the Civil Code.

Violations of the Code of Ethics therefore constitute breach of contract and / or disciplinary offense with all the consequences envisaged in accordance with the current legislation and the National Collective Contract (CCNL) applied in Technital.

In the event of violation by managers, the most suitable measures will be applied in compliance with the provisions of the contractual legislation in force.

In the event of violation by members of the Board of Directors, the Supervisory Body will inform the entire Board of Directors and the Board of Statutory Auditors, which may take the appropriate actions in accordance with the law and inform the Shareholders, if it deems it necessary.

In the event of a violation by one or more Statutory Auditors, the Supervisory Body will inform the Board of Statutory Auditors and the Board of Directors, who will take the appropriate measures including, for example, the calling of the Shareholders' Meeting in order to adopt the most suitable measures required by law.

Any behavior contrary to the Code of Ethics by collaborators, suppliers, agents, distributors or commercial partners may result in the application of sanctions or, in the event of a serious violation, the right of Technital to withdraw from the contract, without prejudice to any requests for compensation if damage to the Company derives from this violation, even independently of the termination of the contractual relationship.

### 4.3 Reports

Any violation, or suspected such, of the Code of Ethics must be reported in writing to the Supervisory Body.

At the end of the investigation phase, the Supervisory Body, if it deems the report well founded, will initiate the necessary communications for the application of any sanctions.

Communications can be forwarded, through the confidential information channel, to:

- e-mail: [marco.strafurini@bdo.it](mailto:marco.strafurini@bdo.it)
- address: Dott. Marco Strafurini (c/o BDO Italia spa) – Viale Abruzzi, 94 20131 Milano

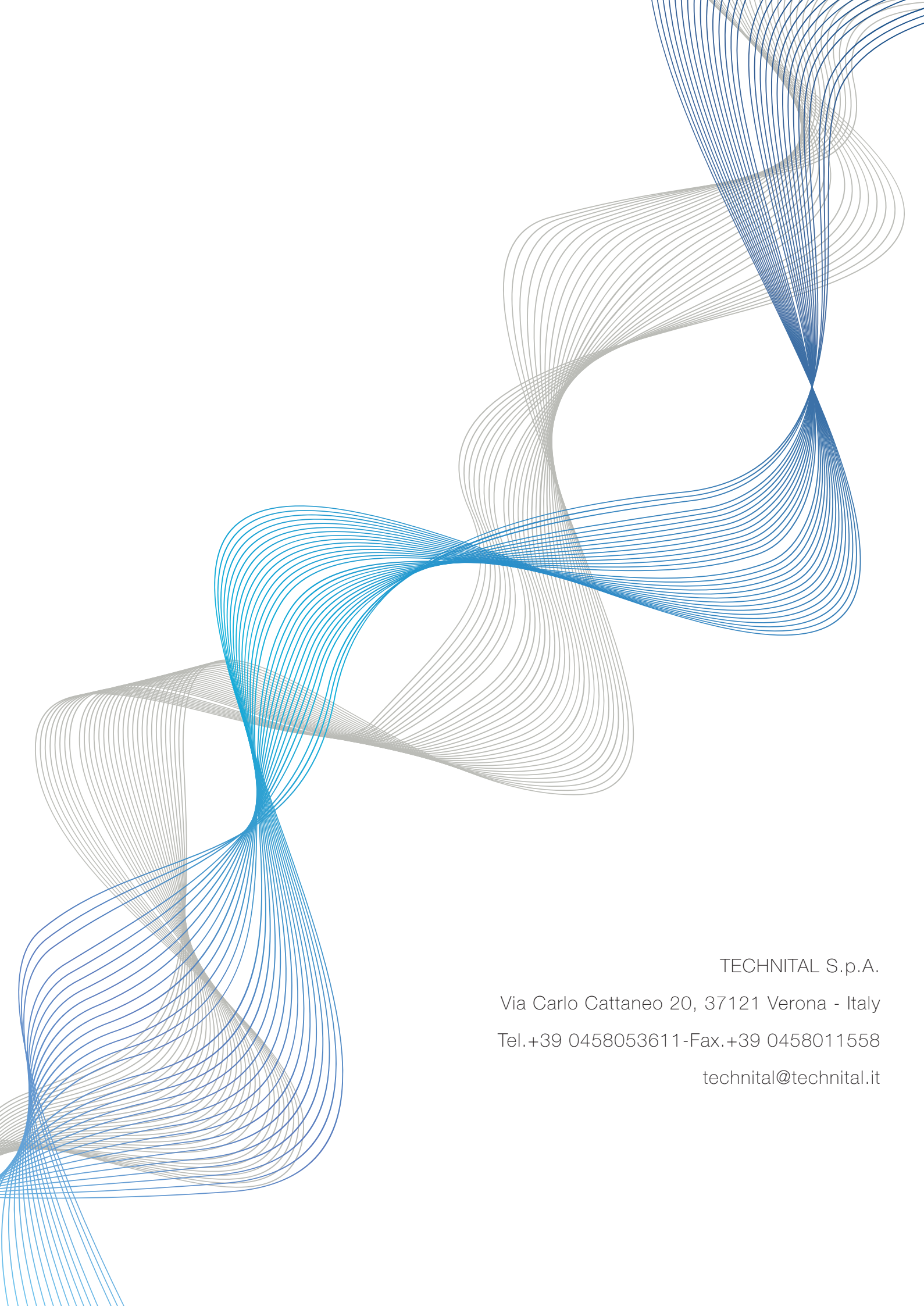
The Supervisory Body acts in such a way as to guarantee the authors of the reports against any form of retaliation, discrimination or penalization or any consequence deriving from the same.

The absolute confidentiality of the identity of the whistleblower is also ensured, without prejudice to good faith and legal obligations.

## 5 ENTRY INTO FORCE AND AMENDMENTS

This Code of Ethics enters into force from the date of its adoption by the Technical Board of Directors.

Any changes or additions must be approved by the Board of Directors.



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