

TECHIMP IMPIANTI S.p.A.

Code of Ethics

Pursuant to Legislative Decree n. 231/2001

*Approved by resolution of the Board of Directors on April
14th 2021*



2021

INDEX

TERMS AND DEFINITIONS	Errore. Il segnalibro non è definito.
PREMISES	5
CONDITIONS, PURPOSES AND CODE VALUE	5
1 GENERAL PRINCIPLES	7
1.1 THE RESPECT OF LAWS, DEONTOLOGICAL DISPOSITION, REGULATIONS AND PROCEDURES	Errore. Il segnalibro non è definito.
1.2 CONFLICT OF INTERESTS.....	7
1.3 HARRASSMENTS AND DISCRIMINATIONS	8
1.4 ABUSE OF ALCOHOL OR DRUGS	9
1.5 SMOKING	9
1.6 SERVICES AND PRODUCTS QUALITY.....	10
2 RELATIONS WITH PUBLIC AND PRIVATE STAKEHOLDERS	10
2.1 GIFTS, DONATIONS AND PRESENTS	10
3 CODE OF CONDUCT TOWARDS PERSONNEL	12
3.1 HUMAN RESOURCES – EQUAL OPPORTUNITIES	12
3.2 PERSONNEL SELECTION	12
3.3 PERSONNEL ASSESSMENT	13
3.4 RIGHTS AND DUTIES OF THE EMPLOYEES	13
3.5 PERSONNEL TRAINING AND UPDATING	15
3.6 TRADE UNION ORGANIZATION	15
3.7 HEALTH AND SAFETY PROTECTION IN THE WORKPLACE	15
3.8 ENVIRONMENT PROTECTON	16
4 CODE OF CONDUCT TOWARDS PUBLIC ADMINISTRATION	19
4.1 ENSURING NEUTRALITY AND GOOD PERFORMANCE OF PUBLIC ADMINISTRATION	19
4.2 DEALING WITH PUBLIC ADMINISTRATION	19
4.3 DEALING WITH PUBLIC INSTITUTIONS AND SUPERVISORY AUTHORITIES	19
4.4 DEALING WITH JUDICIARY AUTHORITY	20
4.5 INFLUENCE ON THE DECISIONS OF PUBLIC ADMINISTRATION	21
4.6 WORKING RELATIONSHIP WITH PUBLIC ADMINISTRATION	22
4.7 TRANSPARENCY ON THE MANAGEMENT OF FUNDING AND CONTRIBUTIONS OF PUBLIC ADMINISTRATION	22
4.8 CONFLICTS OF INTEREST WITH PUBLIC ADMINISTRATION	22
5 CODE OF CONDUCT TOWARDS SUPPLIERS AND CLIENTS	23
5.1 SELECTION	23
5.2 MANAGEMENT OF CONTRACTUAL RELATIONSHIP	Errore. Il segnalibro non è definito.
5.3 PARTICIPATION IN CONFERENCES, CONGRESSES AND SEMINARS	24
6 CODE OF CONDUCT TOWARDS COMMUNITY	24
6.1 DEALING WITH PRIVATE INDIVIDUALS.....	24
6.2 DEALING WITH BANK OPERATOR	24
6.3 DEALING WITH MASS MEDIA AND MANAGEMENT OF EXTERNAL COMUNICATIONS	25

6.4	ECONOMICS RELATIONS WITH POLITICAL PARTIES AND TRADE UNIONS ON A NATIONAL LEVEL	26
7	CODE OF CONDUCT IN COMPANIES ACTIVITIES.....	Errore. Il segnalibro non è definito.
7.1	OPERATIONS AND TRANSACTIONS	Errore. Il segnalibro non è definito.
7.2	PURCHASE OF GOODS AND SERVICES AND ASSIGNMENT TO EXTERNAL CONSULTANCY	Errore. Il segnalibro non è definito.
7.3	COMPUTER SYSTEM MANAGEMENT	27
7.4	USE OF BANKNOTES, LEGAL TENDERS, TAX STAMPS	28
7.5	TOOLS AND SIGNS OF RECOGNITION AND COPYRIGHT SAFEGUARD.....	Errore. Il segnalibro non è definito.
7.6	TERRORISM AND SUBVERSION OF DEMOCRATIC ORDER	29
7.7	PROTECTION OF INDIVIDUAL PERSONALITY	30
7.8	ACTIVITIES AIMED AT HANDLING OF STOLEN ASSETS , MONEY LAUNDERING, USNG MONEY, GOODS OR BENEFINTS OF ILLICIT NATURE AND SELF LAUNDERING	30
7.9	TRANSNATIONAL ACTIVITES AND AFEGUARD AGAINST ORGANIZED CRIMINALS.....	32
7.10	PROTECTION OF COMPETITION	32
7.11	MANAGEMENT OF DATA AND ACCOUNTING, PROPERTY AND FINANCIAL COMPANY INFORMATION	34
7.12	TAX TRANSPARENCY.....	35
7.13	CORPORATE COMMUNICATIONS	35
7.14	DEALING WITH COMPANY CONTROL BODY	36
7.15	PROTECTION OF COMPANY ASSET AND CREDITORS	36
7.16	CONFLICT OF INTEREST OF CORPORATE DIRECTORS	36
7.17	INFLUENCE OF SHAREHOLDER’S MEETING	36
8	CONFIDENCIALITY AND DISSEMINATION OF INFORMATION AND NEWS	36
8.1	COMMUNICATION AND DISSEMINATION OF INFORMATION	37
8.2	DATA PROTECTION	37
9	IMPLEMENTING RULES, CONTROL AND DISTRIBUTION	Errore. Il segnalibro non è definito.
9.1	INTERNAL AUDIT	38
9.2	SUPERVISORY BODY	38
9.3	PENALTIES	39
9.4	INTERNAL REPORTING	39
9.5	AWARENESS.....	40
10	FINAL PROVISIONS	40
10.1	CONFLICT OF CODE PROVISION	Errore. Il segnalibro non è definito.
10.2	CHANGES TO THE CODE	40
	DECLARATION OF ACKNOWLEDGEMENT	Errore. Il segnalibro non è definito.

TERMS AND DEFINITIONS

Legislative Decree n. 231/2001 Or Decree	Legislative Decree June 8th 2001, n. 231 <i>“Administrative liability of legal persons, companies and associations even without legal personality”</i>
Techimp or “the Company”	Techimp Impianti S.p.A.
CdA	Abreviation of <i>“Consiglio di Amministrazione della Società”</i> (Board of Directors)
Organization Model or Model	Organization Management and Control Model adopted pursuant to Legislative Decree n. 231/2001
O.d.V. or Body	Abreviation of <i>“Organismo di Vigilanza”</i> (Supervisory Body)
P.A.	Abreviation of <i>“Pubblica Amministrazione”</i> (Public Administration)
Code of Ethics	The present Code of Ethics, adopted by the Board of Directors (hereinafter the "Board") of Techimp SpA pursuant to Legislative Decree. n. 231/2001
Disciplinary System	Disciplinary System adopted pursuant to Decree 231
Recipients	Anyone acting on behalf, operating and/or working on any basis with Techimp (employees, consultants, suppliers, customers, partners and third parties in general).

PREMISES

The present Code of Ethics includes provisions and general principles adopted by Techimp Impianti SpA.

The values and principles of conduct governing the activities of Techimp also apply to subsidiaries / associated companies, so that every action is guided by transparency, fairness, honesty, integrity and respect for laws and regulations.

The Company complies with the principles and rules of conduct formalized in the Code of Ethics and reserves the right to evaluate the relationship profiles with third parties in the light of these principles and rules. The Company also takes into account any codes of ethics and conduct that may be adopted and implemented by the counterparties with which it interfaces.

PREMISES, PURPOSES AND CODE VALUE

What is the code of ethics?

The present Code of Ethics aims to provide general guidelines concerning an ethical conduct to be adopted in the execution of working activities, and helps to prevent the perpetration of administrative breaches arising from criminal offences described by the Decree.

Who is the recipient of the Code of Ethics?

In the performance of their tasks, all those who act, operate and collaborate on any basis with Techimp (employees, consultants, suppliers and third parties in general) have to deal with situations requiring the adoption of significant behaviors in several respects, the most relevant being the ethical and the legal one (the "Recipients" of the Code).

The rules set in the Model and in the Code of Ethics are applied to:

- All the employees of the Company, regardless of their role and position;
- The components of the corporate bodies;
- Any other entity that may act in the name and on behalf of Techimp;
- Third parties dealing with Techimp and/or acting in their name and on its behalf.

Third parties are all those who deal with Techimp, such as, merely by way of example, suppliers, commercial partners and the contractual counterparties with which the Company has some form of regulated contractual collaboration.

Each of the Recipients of the Code of Ethics, in carrying out their respective tasks or duties, must adopt ethically flawless behavior, as well as legally and professionally correct, in order to help create and maintain an environment focused on trust, both within their own organization and towards subjects who come into contact with the Company.

What does Techimp expect from its employees, collaborators or partners?

All the Recipients of the present Code, as identified above, must adopt and make the colleagues and interlocutor adopt a behavior being compliant to the general principles of honesty, loyalty, good faith, balance, accuracy and diligence, in addition to the specific obligations that may arise from deontology and, however,

from those principles related to the context and the purpose of everyone mission.

In presence or in lack of specific regulations it is necessary that everyone bases his actions on the highest standards of behavior, which the Company uniforms its management to, keeping into consideration that the correct behavior to be adopted in every situation has always its origins not only in the good faith, but also in the frankness, impartiality and above all in the honesty and loyalty of thoughts of the acting persons.

The Company does not intend to have relations with subjects that do not undertake to respect the principles and the rules of the present Code. To this end, Techimp includes in the contracts the clauses concerning the respect of the present Code.

In no way the certainty of acting in the interest or for the benefit of the Company may justify the adoption of behaviors contrasting the principles of the present Code. The application and the respect of the principles is among the most important commitment of collaboration, correctness, diligence, loyalty required by the nature of the performance and by the interest of Techimp.

The above referred commitments, in particular for the employees of the Company, constitute an integration to the article 2104 and 2105 of the Civil Code and of the applicable National Collective Labour Agreement in force.

The present Code constitutes an integral part of the Organization, Management and Control Model adopted by the Company pursuant to the Legislative Decree n. 231/2001.

1 1. GENERAL PRINCIPLES

1.1 THE RESPECT OF LAWS, DEONTOLOGICAL DISPOSITION, REGULATIONS AND PROCEDURES

In the exercise of their respective activities and duties, the Recipients are required to know and diligently comply with the laws in force in all the countries in which the Company operates or may find itself operating, as well as comply with the Code, internal regulations and company procedures and any other deontological disposition of the Company together with the internal regulations.

In no case can the pursuit of the Company's interest justify conduct that is not honest and does not comply with current legislation, company regulations and procedures, the relevant ethical provisions and the present Code.

The recipients are obliged to respect the operative company procedures.

Any violations shall be reported to the competent Authorities.

1.2 CONFLICT OF INTERESTS

Conflict of interest means any kind of incompatibility, of any nature (personal, capital or financial), direct or indirect, between a person and the object of one's business.

There is a conflict of interest in any case in which an interest that is different and / or contrary to the corporate mission is pursued, activities are carried out that may, in any case, interfere with the ability to make decisions in the exclusive interest of the Company, or if one personally benefits of business opportunities of the Company.

For the purposes of the Code of Ethics, the conflict of interest is to be considered potentially existing also with reference to third parties (representatives of customers, suppliers or public institutions, etc.), if they act in contrast with the fiduciary duties linked to their position.

General Principles

It is possible that a conflict of interest arises when in performing the activities, among other things:

- there are interests, including economic and monetary ones, direct or indirect, that may influence the performance of activities for Techimp;
- a personal advantage may be obtained, monetary or not, through the improper access and use of information;
- activities are carried out in favor of the suppliers;
- information related to the Company activities is disclosed, even in informal meetings, before the prior official communication given by the Company;
- the position or the role is exploited in order to take personal advantage, of any nature, in conflict with the interests of Techimp;
- accepting and/or receiving monetary compensation or other favors and benefits of any kind from third-parties or Companies that are or intend to make business with the Company

Operating Rules

If the Recipients of the Code find themselves or believe they can find themselves in a position of conflict of interest, interact with third parties in conflict of interest with the role covered or if there are serious reasons of convenience, they must abstain from adopting any decision and / or from carrying out any activity whose effects fall, directly or indirectly, on the Company.

Both in case of abstention and in case it is not possible to abstain, it is mandatory to inform the Manager about the reasons of the potential conflict, the Manager shall then promptly inform the Managing Director, who will proceed with the evaluation of the effective presence of such conflict and in case authorize the potentially conflicting working activity, only after having set up the necessary measures to prevent actions that are detrimental for the Company

Upon justified request of the Company and/or of the Supervisory body, the interested person must provide further information about the potential or real situation of the conflicting interests he believes to be involved in.

It is therefore forbidden to:

- implement actions and behaviors that are potentially in conflict with the Company's business or with the purposes and interests that they are required to pursue in their role;
- Adopt any conduct or activity that could favor interests in conflicts with those of the Company or with the aims and the interests of the Company, as well as performing work activities or taking decisions that could be, directly or not, connected to an interest, monetary or not, of the spouse, of relatives within the fourth degree and/or cohabitants, of related people (friends, acquaintances etc...) or of organizations of which the above mentioned subjects are administrators law spouse or managers, that could nullify the duty of impartiality and be in contrast with the activities and the aims of the Company;
- give in to undue pressure and / or accept to provide services in the presence of offers or proposals for remuneration, payment or benefits of any kind that may compromise one's independence of judgment;
- make offers, accept assignments or perform their activities in any way when it can be reasonably inferred from known elements that the activity contributes to illegal or illegitimate operations and / or in any case incompatible with the principles of lawfulness, morality and transparency and / or is contrary to the interests of the Company;
- promote any form of participation or contiguity in illicit business for any reason connected and / or attributable to organized crime or in any case to subjects dedicated to illegal practices;
- disclose confidential information acquired in the execution of professional assignments.

1.3 HARRASSMENT AND DISCRIMINATION

General Principles

The Company:

- guarantees a work environment that values the diversity of employees, in compliance with the principle of equality, taking care to protect the dignity and freedom of every employee in the workplace;

- does not tolerate any kind of discrimination of a racial, sexual, political, trade union or religious nature, based on age or health;
- imposes an obligation to refrain from any form of intimidation, harassing act or behavior;
- does not admit sexual harassment, meaning "sexual harassment" any unwanted act or behavior, including verbal, with a sexual connotation that offends the dignity of the person who suffers it;
- does not allow the creation of a climate of intimidation towards the person who suffers the aforementioned harassment.

Operating Rules

Those who believe to be subject to intimidation, harassment or discriminatory behavior or are aware of intimidation, discrimination or harassing and / or discriminatory behavior in place must inform their Manager and / or Top Management, as well as the Supervisory Body, who will proceed with the utmost care and confidentiality to carry out all the actions they deem appropriate, in order to allow the difficult situation to be overcome and restore a serene work environment.

1.4 ABUSE OF ALCOHOL OR DRUGS

General Principles

Techimp considers it reprehensible to perform work tasks under the effects of alcohol or drugs and also the use of such substances during working hours.

The entire workforce is encouraged to behave with the utmost integrity and correctness, also in compliance with current legislation and applicable collective agreements and company procedures.

Operating Rules

Those who detect behavior and rules in conflict with the principles in question must inform the Top Management and the Supervisory Body, who will take action with the utmost promptness and confidentiality for all the actions they deem appropriate.

1.5 SMOKING

General Principles

Smoking is forbidden in workplaces, in places accessible to the public and in places where computer equipment and, in general, at risk of fire are stored.

Techimp, in any case, takes into consideration the uncomfortable condition of non-smokers on the one hand and smokers on the other, identifying, where possible, areas for smokers, in compliance with current legislation.

Operating Rules

Those who detect behavior even potentially in conflict with the principles and rules in question must inform the top management and the Supervisory Body, who will proceed with the utmost promptness and confidentiality to carry out all the actions they deem appropriate.

1.6 QUALITY OF SERVICES AND PRODUCTS

General Principles

Techimp focuses its activities on the satisfaction and protection of its clients, listening to requests that can lead to an improvement in the quality of services; for this reason, the Company directs its development and marketing activities to high standards of quality of its services.

Operating Rules

The Company undertakes to ensure that:

- contracts and work assignments must be carried out in accordance with what is consciously established by the parties;
- conditions of ignorance or incapacity of one's counterparts are not exploited;
- no Recipient takes advantage of contractual gaps or unforeseen events to renegotiate the contract for the sole purpose of exploiting the position of dependence or weakness in which the counterparty has found itself;
- the quality standards defined by the Company are always adopted, verified and respected;

2 RELATIONS WITH PUBLIC AND PRIVATE STAKEHOLDERS

General principles

Techimp condemns any conduct, on its behalf, by the members of the corporate bodies, by employees of the Company, or by consultants, collaborators and third parties acting on its behalf, aimed at unduly influencing the correctness of the work of third parties, public or private individuals, who enter into a relation with the Company in carrying out their activities

In particular, the Company condemns any conduct aimed at promising or offering, directly or indirectly, money, services, performance or other benefits to Italian or foreign public officials and / or persons in charge of public service, which may result in undue or illicit interest or advantage, except in the case of gifts or other benefits of modest value and, in any case, falling within the usages, customs or legitimate activities.

Relations with clients, public and private, are based on a sense of responsibility, commercial fairness and a spirit of collaboration.

2.1 GIFTS, DONATIONS AND PRESENTS

Techimp condemns any conduct, on its behalf, by the corporate bodies and their members, or by the employees of the Company, as well as by consultants, collaborators and third parties acting on behalf of the Company itself, consisting in promising or offering, directly or indirectly, money, services, performances or other benefits to public or private entities from which an undue or illegal interest or advantage may be obtained for the Company.

Gifts and acts of courtesy and hospitality to government representatives, public officials and / or persons in charge of public service in Italy or abroad, collaborators, customers, suppliers, business partners, etc. are allowed when they deal with gifts or other benefits of modest value and falling within the usages, customs or legitimate activities, and in any case such as not to compromise the integrity or reputation of one of the parties and cannot be interpreted by an impartial observer, as aimed at acquiring advantages in an improper way.

No one can solicit, nor in any case accept, directly or indirectly, for example through their family members, gifts from suppliers, even if only potential, of the Company, if they may appear in any way connected to existing relationships with Techimp or, in any case, can hint that they are aimed at acquiring undue advantages.

As regards relations with customers, gifts and business expenses must be consistent with current legislation and market practices, they must not exceed the permitted value limits and must have been approved and registered in accordance with the provisions set out in the internal rules.

Operating Rules

With the term of gifts we mean material goods, such as presents or money, but also intangible goods or services and discounts for the purchase of such goods or services or any other benefit, direct or indirect.

In general, gifts that exceed the threshold of 150 euros are not considered of modest value

Anyone who receives gifts, even at their own home, as a result of the activities carried out or to be carried out in favor of Techimp and falling within the scope of the prohibitions indicated above, must inform his Manager or the Chief Executive Officer, providing for the immediate return of said gifts.

It is possible to accept gifts of symbolic or modest value from customers, suppliers and partners, provided that the same at the same time:

- Comply with the applicable legislation;
- cannot suggest their connection to obtained advantages or their finalization to acquire undue advantages;
- are normally offered to any other person who has similar relationships or on the occasion of anniversaries or holidays.

Moreover, it is compulsory to:

- not to pay or offer, directly or indirectly, payments and material benefits of any size to influence or compensate for an official act;
- not to engage in illegal, collusive practices and behaviors, illicit payments, attempts at corruption and favoritism.

All decisions concerning the provision of gifts must be duly motivated, traced and authorized by the Top management.

The aspects related to the provision of gifts and presents and business expenses, with particular reference to limits, authorization process, traceability and registration of gifts / expenses, as well as any related communication are governed by instructions adopted from time to time by the Company.

The Supervisory Body may carry out audits and / or request specific reporting / information regarding the quantity, extent and beneficiaries of any granted / authorized gifts.

3 CODE OF CONDUCT TOWARDS PERSONNEL

3.1 HUMAN RESOURCES – EQUAL OPPORTUNITIES

General Principles

Human resources are an indispensable element of corporate organization and therefore represent the main source of the Company's success, both from a more general institutional profile and from a more strictly corporate profile.

The Company offers all employees the same opportunities, on the basis of merit criteria and in compliance with the principle of equality, and undertakes to fully enhance all the professional skills present in the company structure, allowing everyone to develop their own attitudes, skills and expertise, preparing, if necessary, education and / or training programs and / or refresher courses.

The Company protects workers belonging to protected categories by promoting their integration into the working environment.

Techimp undertakes to fully enhance all the professional skills present in the company structure, by activating the levers available to encourage the development and growth of its collaborators / employees.

Operating Rules

All employees must be aware of the legislation governing the performance of their functions and consequent behavior; otherwise, the employee should proceed to report the existing non-compliance situation to his Manager.

The Company ensures the provision of information and training tools to all collaborators / employees with the aim of enhancing the specific skills and preserving the professional value of each person.

3.2 SELECTION OF PERSONNEL

General Principles

The process of selecting the personnel to be hired is aimed at hiring the most suitable and most valid resources in consideration of the correspondence of the candidates' profiles and their specific skills, with respect to what is expected and the company needs, as resulting from the proposal made by the requestor.

The personnel selection process is based, at every stage, on respect for equal opportunities for all those involved.

The information requested and / or in any case acquired during the personnel selection phase is strictly connected to the verification of the requirements related to the professional and psycho-aptitude profile requested, in compliance with the private sphere and the opinions of the candidate.

Operating Rules

The mere promise of hiring a person in exchange for favors can be an offense.

Favoritism, nepotism or forms of clientelism in the selection and recruitment phases of personnel are generally prohibited.

The Company must verify the compliance with the principles outlined above, within the limits of the information available, as well as adopt appropriate preventive measures.

The Company is strictly prohibited from employing foreign workers without a residence permit or with a revoked or expired permit, for which a duly documented application for renewal has not been submitted.

3.3 PERSONNEL ASSESSMENT

General Principles

The Company undertakes to ensure that within its corporate organization the annual objectives, both general and individual, of the personnel, are such as not to lead to unlawful conduct and are, instead, aimed at a possible, specific, concrete, measurable result and related to the expected timing for their achievement.

Operating Rules

Any situations of difficulty or conflict with the aforementioned principle must be promptly reported by anyone to his Manager, as well as to the Supervisory Body, so that any corrective actions can be implemented.

3.4 RIGHTS AND DUTIES OF THE EMPLOYEES

Operating Rules

On the basis of the applicable employment contracts, whether collective, corporate or individual, as well as the rules established by the Italian Civil Code and by the law, the employee is assigned certain rights and duties.

Techimp employee, in particular, has the right to:

- a) exercise the functions inherent to his qualification while being able to be assigned to another function, taking into account operational requirements and in compliance with the laws and collective, national and corporate labor bargaining
- b) the economic and regulatory treatment provided for by the laws and by the collective, corporate and individual employment contracts;
- c) the protection of health and safety in the workplace which must comply with current legislation in the field of safety and hygiene;
- d) the legal assistance in the cases expressly provided for by collective and individual contractual legislation;
- e) in carrying out any activity, all Collaborators are required to avoid situations of personal interest which constitute or may constitute, even though only potentially, a conflict between individual interests and those of the Company. In this regard, each Collaborator is prohibited from taking part, directly or indirectly, for any reason whatsoever, in commercial initiatives that place themselves, even though only potentially, in a situation of competition with the Company, unless such participation has been previously communicated to the administrative body of the Company and approved by the same, after hearing the opinion of the Supervisory Body.

The Company employee, moreover, is obliged to:

- a) know and comply with the current legislation, company processes, procedures and guidelines as well as the principles contained in the present Code;
- b) comply with the provisions and instructions given by the Company, the Manager or, in any case, by his own Managers;
- c) fulfill all the obligations necessary for the protection of safety and health in the workplace;
- d) provide colleagues, executives and / or his Managers with adequate collaboration, communicating all the necessary and / or requested information, and ensuring to operate with maximum efficiency in the execution of the tasks assigned and in the pursuit of common objectives;
- e) avoid abusing or generating false beliefs in relation to his position, role or powers held within the Company and the role of the Company itself, by intervening immediately in order to eliminate every and any misunderstanding;
- f) not to perform acts contrary to official duties, nor to omit or delay an official act for the undue achievement or promise of money or other benefits for oneself or for others;
- g) treat all parties with which comes into contact in the course of work performance in a fair and equitable manner in order to maintain the market confidence and in particular of suppliers to the Company, avoiding favors or pressure, real or apparent, with the aim of obtaining particular advantages from certain suppliers, partners and third parties in general;
- h) keep confidential any information and data relating to the Company's business, including financial and economic ones, which he might acquire due to the role held within Techimp, including those relating to the Company's suppliers and partners;
- i) not to use information obtained in the course of the activity carried out for the Company for personal purposes or to obtain advantages of a financial or non-financial nature;
- j) promote knowledge of the Code towards all subjects with whom they entertain relations, of a formal and informal nature, in the course of carrying out the business;
- k) not to disclose any information about the suppliers of the Company to third parties and in particular to other suppliers of the same;
- l) not to denigrate, in any case, the Company and / or anyone who has had relations of any nature and for any reason with it;
- m) not to participate in meetings, including informal ones, with subjects interested in obtaining information on relevant issues regarding office activities, unless expressly authorized by his Manager;
- n) avoid attending associations, clubs or other bodies of any nature, if this may result in obligations, constraints, expectations that interfere with the exercise of his business;
- o) report truthfully and correctly to the Company the information he is required to, based on the provisions of the Model and / or company regulations / procedures, such as, for example, the summary report of the time spent, the expense report, the minutes of the activities carried out, etc .;
- p) take care of the premises, furniture, vehicles, tools or materials made available to him, avoiding to be used for personal needs, except in particular cases of emergency and always

in compliance with the applicable company provisions, the working tools, including telephone lines;

- q) acquire the professional skills necessary for the performance of his business and keep, for the entire duration of the employment relationship, an adequate level of knowledge and experience , constantly updating his preparation and attending any refresher or retraining courses proposed and activated by the Company;
- r) not to take undue profits or advantages, direct or indirect, financial or otherwise, with or without damage to the Company, from carrying out their work;
- s) behave in a proper way and use language and clothing appropriate to the work environment;
- t) promptly and proactively fulfill the obligations envisaged by the Model (such as, for example, participation in training courses and / or meetings with the Supervisory Body, sending reports and information, etc.), avoiding obstructive behavior that could compromise the functioning of the Model, of the SB and the monitoring and verification of the functions assigned to control;
- u) report any violations of the Code of Ethics, of the Model and any facts that can - even though only potentially - integrate some of the crimes referred to in the Decree, in the manner described in paragraph 9.4 below.

3.5 PERSONNEL TRAINING AND PROFESSIONAL UPDATING

Operating Rules

The Company provides training and professional updating programs for employees, differentiated depending on the role, skills, responsibilities and functions performed by the staff themselves.

Techimp regularly promotes awareness programs for its employees, with particular reference to the obligations regarding the confidentiality of information and the conduct to be followed with the companies participating in the tenders.

3.6 TRADE UNION ORGANIZATION

General Principles

The Company interacts with trade unions with a spirit of collaboration and transparency, without prejudice to mutual respect for the different roles, national collective agreements and any supplementary company agreements.

Operating Rules

All employees are free to choose the trade union organization to join, or not to join and can also join any political party or organization that does not violate the rules in force, without suffering any discrimination or favoritism.

3.7 HEALTH AND SAFETY PROTECTION IN THE WORKPLACE

General Principles

Within the existing regulations, the Company undertakes to take all necessary measures to protect the physical and moral integrity of its workers.

In particular, the Company undertakes to ensure as follows:

- compliance with current legislation on workers' health and safety is considered a priority;
- the risks for workers are, as far as possible and guaranteed by the evolution of the best technique, also avoided by choosing the most appropriate and least dangerous materials and equipment and such as to mitigate the risks at source;
- unavoidable risks are correctly assessed and suitably mitigated through appropriate collective and individual security measures;
- the information and training of workers is disseminated, updated and specific with reference to the job performed;
- consultation of workers on health and safety in the workplace is guaranteed;
- deal quickly and effectively with any safety needs or non-compliance emerging during the work activities or during audits and inspections;
- the organization of work and the operational aspects of the same are carried out in such a way as to ensure the health of workers, third parties and the community in which the Company operates;
- workers are not in any way subject to conditions of exploitation through violation of the rules on health and safety in the workplace, taking advantage of their state of need.

In order to pursue the aforementioned purposes, the Company allocates organizational, instrumental and economic resources with the aim of ensuring full compliance with the accident prevention regulations in force and the continuous improvement of the health and safety of workers in the workplace and the related prevention measures.

Operating Rules

The workers, each one in relation to his own specific duties, are required to:

- ensure full compliance with the laws in force in the various countries in which the Company operates, and their subsequent updates and the principles of the present Code and company procedures and any other internal provision required to ensure the protection of health and safety in the workplace (ie occupational health and safety management system certified according to the OHSAS 18001 Standard adopted by Techimp), as well as
- to report any violations or even simple attitudes or practices in contrast with the provisions of the Code of Ethics and the Model and other company provisions for the protection of health and safety in the workplace.

It is absolutely forbidden for workers to behave in such a way that could put their own health and the one of the others at risk.

3.8 ENVIRONMENT SAFETY AND PROTECTION

General Principles

Techimp considers the environment a primary asset and promotes its protection and respect from all the employees or collaborators in any capacity, customers, suppliers and partners.

Company choices are always aimed at ensuring the greatest possible compatibility between economic initiative and environmental needs, not limited to simple compliance with current

legislation, but with a view to sustainable synergy with the territory, natural elements and the health of workers.

For this purpose, the Company invites the Recipients to adopt, in all cases it is possible, the necessary measures and precautions for the optimization of resources and the minimization of the environmental impacts of the activities.

Within the existing legislation, the Company undertakes to take all necessary measures to ensure a safe and secure working environment, as well as respectful of the surrounding environment. To this end, the Company undertakes to:

- continuously improve the environmental performance of its processes and meet all legislative and regulatory requirements on the subject
- minimize the environmental impact, optimizing the use of resources;
- seek, in the exercise of its typical business, solutions compatible with sustainable development, aiming at the enhancement of natural resources, at minimum consumption of the territory and at minimum waste of energy sources;
- avoid, within the limits of the functions entrusted, causing alterations to the environment in which he operates that may affect the ecological balance and / or the conservation of cultural, artistic, historical and landscape assets.

Operating rules

The Company undertakes to conduct all its activities in compliance with the principles of environmental sustainability, acting through concrete choices. The Company also monitors the environmental impacts of its activities, and systematically seeks improvement in a coherent, effective and sustainable way. To this end, Techimp has adopted an Environmental Management System certified in accordance with ISO 14001.

In particular, the Company undertakes to:

- take into due account the needs of all stakeholders and local communities in the countries in which the Company operates;
- catch the stimuli of those customers that focus their development strategy on sustainability;
- prefer suppliers that demonstrate the best performance in terms of sustainability and environmental impact;
- where it is necessary to resort to the intervention of authorized subjects (disposer operators, transporters, etc.), for the fulfillment of the obligations regarding environmental protection, select the same among those in possession of the highest requirements of reliability, professionalism and ethics, in compliance with the provisions of the Model and the applicable company procedures and regulations.

The Company also uses low environmental impact products and pays attention to separate waste collection in its offices.

Techimp's environmental commitment is also aimed at raising the awareness of its employees who are obliged to:

- contribute, together with the HSE Manager and the Health and Safety Officer, to the fulfillment of the obligations provided for by the legal provisions on environmental issues;
- immediately report any anomalies in environmental matters to the aforementioned subjects;
- participate in organized education and training programs.
- take all reasonable precautions to maintain a safe and healthy work environment;
- ensure not to jeopardize themselves or others with their actions;
- promptly report to the competent functions and to the SB all behaviors detected or of which they have become aware that may compromise the safety of the workplace.

All the Recipients are obliged to:

- comply with all regulations relating to environmental protection.
- aim at achieving the objectives defined as part of the environmental strategy which is based on the following pillars:
 - products (reduce the environmental impact of products as much as possible);
 - standards (to respect and, if possible, exceed standards and laws on "environmental" matters);
 - waste (reduce the amount of raw materials used for our products);
 - recycling (use recycled / recyclable materials in products whenever possible);
 - awareness (educating employees and the community to reduce waste production and excessive use of resources);
 - research (developing new products in line with the principles of environmental responsibility);
 - structures (defining and maintaining programs to design and manage structures respecting and, where possible, exceeding the standards defined by laws and regulations);
 - decision-making criterion (considering environmental issues in all the main business operations of the Company);
 - responsabilità per il passato (agire responsabilmente per porre rimedio a eventuali impatti negativi sull'ambiente delle passate pratiche di business);
- use resources efficiently.
- immediately report any violation, even if only suspected, of the Code and of the Company's policies.

4 CODE OF CONDUCT TOWARDS THE PUBLIC ADMINISTRATION

4.1 ENSURING NEUTRALITY AND GOOD PERFORMANCE OF PUBLIC ADMINISTRATION

General Principles

The Company, the Corporate Bodies and their members, employees, consultants, collaborators and in general third parties who act on behalf of the Company in relations with the Public Administration, Italian or foreign, inspire and adapt their conduct to the respect of the impartiality and good performance of the Public Administration.

4.2 DEALING WITH PUBLIC ADMINISTRATION

General Principles

The Company's relations with the Public Administration, public officials or persons in charge of a public service must be inspired by the most rigorous impartiality and fairness, in compliance with the applicable legal and regulatory provisions and may not in any way compromise the integrity or the reputation of the Company.

For no reason does the Company carry out - or instruct / incentivize others to perform - actions or acts that may appear, even if only potentially aimed at carrying out acts contrary to official duties or aimed at the omission or delay of an official act, not even making use of the intermediation or mediation work of external subjects.

In no case does Techimp take advantage of existing relationships - for whatever reason - between a third party (whether or not acting on its behalf) and the Public Administration for the purposes of achieving its business objectives.

Operating Rules

The undertaking of commitments and the management of relations, of any kind, with the Public Administration, public officials or persons in charge of a public service, are reserved exclusively for the dedicated corporate functions and for the authorized personnel.

In any case, these subjects are required to diligently prepare and keep all documentation relating to relations with the Public Administration.

In the context of relations with the Public Administration, public officials or persons in charge of a public service, the Recipients are required to refrain from:

- offering, including through a third party, money, job or commercial opportunities or, more generally, other benefits, to the public official, his family members or to subjects connected to him howsoever;
- from unlawfully seeking or establishing personal relations of specific purpose, influence, interference suitable to condition, directly or indirectly, the outcome of the relationship.

4.3 DEALING WITH PUBLIC INSTITUTIONS AND SUPERVISORY AUTHORITIES

General Principles

The Company handles relations with public institutions on the basis of the principles of integrity, fairness and professionalism.

Operating rules

The Recipients are required to scrupulously observe the regulations in force in the sectors connected to their respective areas of activity and the provisions issued by the competent Institutions and / or by the Supervisory Authorities.

On the occasion of audits and inspections by the competent public Authorities, the corporate bodies and their members, the employees of the Company, consultants, collaborators and third parties acting on behalf of the Company, must maintain an attitude of maximum availability and of collaboration with inspection and control bodies.

The Recipients promptly comply with any request from the competent inspection and / or supervisory Authorities to carry out audits or controls, providing full cooperation and avoiding obstructive behavior.

It is forbidden to obstruct, in any way, the functions of the public supervisory Authorities that come into contact with the Company due to their institutional functions.

4.4 DEALING WITH THE JUDICIAL AUTHORITY

General Principles

The Company operates in a lawful and correct manner, collaborating with the Judicial Authority and the bodies delegated by it with the utmost transparency.

As regards any existing disputes, the activity carried out for the management of the same must be based on the principles of legality, correctness, transparency and all other ethical principles defined in the Code.

Operating Rules

In the event of audits, inspections or investigations, all existing documentation is made available to the Judicial Authority with absolute prohibition on destroying or altering records, minutes, accounting records and any other type of document, as well as lying or persuading others to do so.

The managers, employees and collaborators in any capacity of the Company must refrain from unlawful conduct aimed at influencing the impartiality of judgment and / or the behavior of their interlocutors, and in any case to obtain a favorable outcome of the dispute for the Company, such as, for example:

- give or promise money or other benefits to Public Officials or to persons in charge of a public service or to persons indicated by them;
- send false documents, certify non-existent requirements or provide guarantees / declarations that do not correspond to the truth;
- delete documents or destroy archived documents;
- giving or promising money or other benefits to the legal consultants of the counterparty companies in a dispute.

The top Management, with the collaboration of the Legal department, protects the confidentiality of the information received on any ongoing proceedings, identifying the subjects who may become aware of them and the methods of archiving and conservation of the same.

Moreover, the Company:

- reaffirms the absolute autonomy of the person called to make statements to the Judicial Authority in the choice of the lawyer he trusts;
- if it becomes aware of the involvement of a subject in a proceeding as a person with the right not to respond, it takes the appropriate measures aimed at ensuring the independence and autonomy of the subject and at the same time protecting the Company from potential risks in terms of administrative liability of entities;
- provides the absolute prohibition towards all staff, at any level of the company structure, from engaging in discriminatory and / or retaliatory behavior against the subject as a consequence of the statements made by the same to the Judicial Authority.

Indeed, it is forbidden for everyone to bring any type of pressure on the subjects involved in a proceeding in any capacity or role (i.e. suspects, accused, witnesses, etc.).

In particular, it is absolutely forbidden to engage against the person called to make statements before the Judicial Authority, in the context of a criminal proceeding and having the right not to respond, behaviors aimed at conditioning or influencing him in the context of his declaration ; and, therefore, all the company functions that interact with the subject, by reason of the performance of their work activities, are required not to adopt behaviors that could be conditioning for the subject (such as, for example: decisions on performance evaluation or donation of bonuses, promise of salary increases or career advancements, threat of disciplinary sanctions, dismissals or reductions in remuneration, as well as other forms of demotion or transfer, etc.), in order to safeguard the principle of independence and autonomy of the same in expressing himself before the Judicial Authority

The Company identifies specific rules of conduct relevant to the modalities to deal with the subjects possibly involved in a proceeding in any capacity or role, who have the right not to respond (both in terms of telephone contacts, and of possible measures such as any suspension of the assignment, the suspension of assessments relating to the awarding process, the suspension of disciplinary sanctions, etc.), in compliance with the legal rules characterizing the relationship between the subject and the Company.

Any judicial proceeding concerning the relevant offenses pursuant to the Decree must be promptly communicated to the SB.

4.5 INFLUENCE ON THE DECISIONS OF PUBLIC ADMINISTRATION

General Principles

The Company does not admit any conduct held by the persons in charge of or conducting business negotiations, requests or relationships with the Italian and / or foreign Public Administration on its behalf, aimed at unlawfully influencing the decisions of public officials or persons in charge of public service who deal with and take decisions on behalf of the Italian or foreign. P.A.

Operating rules

During a business negotiation, request or commercial relationship with public officials and / or persons in charge of public service, Italian or foreign, the following actions cannot be taken - directly or indirectly:

- propose - in any way - employment and / or commercial opportunities that may favor public officials and / or persons in charge of a public service in a personal capacity or through a third party;
- offer money or other benefits in any way, except in the case of gifts, giveaways or other benefits of modest value and, in any case, falling within the legitimate and authorized customs or practices based on the applicable company procedures;
- carry out any other act aimed at inducing Italian or foreign public representatives to do or omit to do something in violation of the laws of the legal system to which they belong.

4.6 WORKING RELATIONSHIP WITH PUBLIC ADMINISTRATION

Operating Rules

It is forbidden to establish employment relationships and / or of any other form, including counseling relationships with former employees of the Italian or foreign PA, who, due to their institutional functions, participate or have personally and actively participated in business negotiations or endorsed requests made by the Company to the Italian or foreign PA, unless said relationships have been preliminarily and adequately declared and assessed by the top management, before proceeding with the possible employment / establishment of the relationship, as well as communicated to the Supervisory Body jointly to the related assessments.

4.7 TRANSPARENCY ON THE MANAGEMENT OF FUNDING AND CONTRIBUTIONS OF PUBLIC ADMINISTRATION

General Principles

The Company condemns any conduct aimed at obtaining, from the State, from the European Bodies or other public bodies, any type of contribution, loan, soft loan or other provision of the same type, by means of altered or falsified declarations and / or documents, or through omitted information or more generically, through artifices or deceptions, including those carried out by means of an IT and / or telematic system, aimed at misleading the lender.

Operating rules

It is forbidden to allocate for purposes different than those for which they were granted, contributions, subsidies or loans obtained by the State or other public body or by European organizations, even of modest value and / or amount.

4.8 CONFLICT OF INTEREST WITH PUBLIC ADMINISTRATION

Operating Rules

The Company cannot be represented in relations with the Italian or foreign Public Administration by subjects in a recognized position of conflict of interest, unless said situation has been preliminarily declared to the Top Management and adequately assessed and justified in order to the possibility of conferring the aforementioned power of representation.

Such circumstance, and the related assessments, is notified to the Supervisory Body.

Individuals who work on behalf of the Company are obliged to refrain from having relations with the Italian or foreign Public Administration, in any case in which there are situations of conflict of interest

5 CODE OF CONDUCT TOWARDS SUPPLIERS AND CUSTOMERS

5.1 SELECTION

General Principles

In relations with suppliers, the Recipients must be inspired by the principles of absolute honesty, loyalty, good faith, balance, correctness, diligence, effectiveness, efficiency, clarity, impartiality, transparency and confidentiality.

Operating Rules

Any behavior that may cause prejudice or damage, even indirectly, to the Company, and / or which may lead to unjustified favoritism, giving one supplier an advantage over others, must be avoided.

In particular, in the selection of the suppliers, Recipients must:

- avoid any discrimination and allow maximum participation and competition between potential suppliers, giving third parties the opportunity to confront themselves according to rules of fairness in order to entertain business relationships with the Company;
- assess any potential conflicts of interest before involving a third party;
- choose qualified business partners who have a good reputation in terms of quality and honesty.

All Recipients are therefore required to observe, in the context of the provisions of current legislation and internal provisions, the procedures established to make the best choice of suppliers and to operate a correct management of the relationship with them, even in the phases of execution of the contract.

5.2 MANAGEMENT OF THE CONTRACTUAL RELATIONSHIP

General Principles

The Company guarantees the correct management of the relationship with the supplier, ensuring the regular execution of the contract in compliance with all the clauses contained therein.

Operating rules

When dealing with suppliers, the Recipients are strictly prohibited from:

- accept non-existent services;
- authorize undue payments,
- appoint third parties to carry out illegal or unethical activities.

At the same time, the Recipients must:

- ensure that all agreements with suppliers and business partners comply with company policies, including the provision of clauses for acknowledging and respecting the Code of Ethics;
- give third parties the opportunity to discuss according to rules of fairness in order to have business relationships with the Company;
- consider the presence of any potential conflicts of interest before involving a third party;

- choose qualified business partners who have a good reputation in terms of quality and honesty;
- ensure that all agreements with business partners comply with the Company's policies.

5.3 PARTICIPATION IN CONFERENCES, CONGRESSES AND SEMINARS

Operating Rules

Participation in initiatives such as seminars and / or conferences organized by suppliers is not permitted without the prior authorization of the Manager, after consulting the CEO.

If participation in courses and / or seminars is necessary for the proper execution of the services deriving from existing relationships with certain suppliers, Techimp employees will be required to use their own transport and accommodation or otherwise made available by the Company.

However, it is possible to accept transport to and from the related locations, in addition to the related accommodation and meals, prior specific authorization, provided that their value is always within the limits of reasonableness.

6 CODE OF CONDUCT TOWARDS COMMUNITY

6.1 DEALING WITH PRIVATE INDIVIDUALS

Operating rules

The recipients of the present Code of Ethics are prohibited from:

- make cash donations or grant other advantages of any kind (promises of employment, use of company properties, etc.) to representatives (top management or subordinates) of other companies or private entities aimed at obtaining any advantage for the Company;
- perform services or grant benefits of any kind in favor of representatives of commercial partners and / or consultants who are not adequately justified in the context of the relationship established with them, even through a third party;
- acknowledge remuneration or other advantages of any kind in favor of external Agents / Collaborators who are not adequately justified in relation to the type of assignment to be carried out and the practices in force in the local area;
- make cash donations or acknowledge other benefits, also through a third party, in favor of its suppliers, which are not adequately justified in the context of the relationship established with them or which may lead to ensure an undue advantage for the Company;
- receive advantages of any kind, exceeding normal commercial or courtesy practices, or in any case aimed at acquiring undue favorable treatment in the conduct of any company activity, in exchange for the payment of money or benefits of any kind.

6.2 DEALING WITH BANK OPERATORS

Operating rules

In the context of relations with banking operators, the Company's activities must comply with the following control principles:

- compliance with the roles and responsibilities defined by the company organization chart and by the authorization system with reference to the management of relations with financial / banking operators;
- correctness and transparency in relations with banking institutions, in compliance with the principles of correct management and transparency;
- integrity, impartiality and independence, not improperly influencing the decisions of the counterparty and not requiring preferential treatment (prohibition to promise, provide or receive favors, sums and benefits of any kind);
- completeness, accuracy and truthfulness of all information and data transmitted to banking institutions.

6.3 DEALING WITH MASS MEDIA AND MANAGEMENT OF EXTERNAL COMMUNICATIONS

General principles

Communication with the mass media by the Company must be transparent and truthful.

Any form of pressure or acquisition of favorable attitudes by the media is prohibited.

Operating rules

Relations with the mass media are exclusively reserved for the appointed bodies or the company function in charge of this, prior to the express authorization of the top Management and in compliance with Techimp policies.

No one can provide external news or information regarding Techimp or entertain relations with the mass media, without the prior authorization of top Management.

Any contact with the mass media must be promptly communicated to the top Management.

The publication of articles or studies or participation in conferences or broadcasts, even outside of the working activity, relating to matters falling within the competence of the Company, must be authorized in advance by the top Management; in any case, Techimp recommends all Recipients to ensure that there is no confusion between personal interests and those of the Company (for example, it is necessary to avoid using Techimp letterhead or e-mail messages to express personal opinions or to authorize transactions for personal purposes), also specifying the personal nature of the assessments made and specifying that they do not necessarily represent the official position of the Company.

However, it is not permitted to make statements, affirmations or communications to the public that may in any way harm or put in a bad light the position and the work of Techimp.

In the management of any advertising spaces and / or the Company's website, the Recipients are required to verify, each according to their skills, that the proposed contents are not contrary to the law, with particular reference to scrupulous compliance with current legislation for the protection of minors, as well as to ensure that they do not concern issues or aspects attributable to:

- induction into child prostitution;
- exploitation of minors for pornographic performances or for the production and possession of pornographic material;
- propaganda of tourism initiatives aimed at the exploitation of prostitution;
- induction in any form, explicit or implicit, to racial discrimination;

- induction to violence for the purpose of terrorism or subversion of the democratic order.

6.4 ECONOMIC RELATIONS WITH POLITICAL PARTIES AND TRADE UNION ORGANIZATIONS AT NATIONAL LEVEL

Operating rules

The Company does not make direct or indirect contributions to political or trade union parties, movements, committees and organizations, or to their representatives and candidates.

The Company also prohibits any sponsorship of events / congresses or parties that have a political propaganda purpose, except within the limits permitted by law and after the adoption of an express resolution of the administrative body, refraining from any direct or indirect pressure to politicians.

7 CODE OF CONDUCT IN COMPANY ACTIVITIES

7.1 OPERATIONS AND TRANSACTIONS

Operating rules

Each operation and / or transaction, in its broadest sense, must be legitimate, authorized, coherent, congruous, documented, recorded and verifiable at any time.

The procedures that regulate economic or financial transactions that involve handling of money incoming or outgoing must allow the possibility of carrying out audits on the characteristics of the operation, on the reasons that allowed its execution, on the authorizations to carry it out, on the execution of the operation itself.

Any person who carries out operations and / or transactions involving sums of money, goods or other economically valuable assets belonging to the Company, must be expressly authorized and provide, upon request, all valid evidence for its verification at any time.

Each corporate function is responsible for the truthfulness, authenticity and originality of the documentation produced and the information provided in carrying out the activity within its competence.

Compliance with the principles of correctness, transparency and good faith in relations with all contractual counterparties must be guaranteed.

The assignments given to any service companies and / or individuals who look after the economic / financial interests of the Company must be drawn up in writing, with an indication of the contents and the agreed economic conditions. Any exceptions must be duly authorized and justified.

With reference to the commercial / professional reliability of suppliers and partners, all the necessary information must be requested and obtained in order to assess the ethical reputation / reliability of the contractual counterpart (e.g. organizational model pursuant to Legislative Decree No. 231/2001, certifications, legality ratings, etc.).

7.2 PURCHASE OF GOODS AND SERVICES AND ASSIGNMENT TO EXTERNAL CONSULTANCY

General Principles

Employees and subjects who make any purchase of goods and / or services, including the assignment of external consultancies, on behalf of the Company, must act in compliance with the principles of transparency, correctness, cost-effectiveness, quality, inherence and lawfulness and operate with the outmost diligence, and in compliance with the specific procedures and / or internal regulations of the Company.

Operating rules

Recipients must undertake to:

- select the suppliers and consultants on the basis of the procedures in force, in compliance with the criteria of reliability and competence of the subject and assignment to the same of tasks by means of a contract / formal letter of appointment;
- define as much as possible the exact content of the service and any project outputs in order to allow verification of the service rendered even afterwards;
- duly file all documentation, in particular the final version of the documents, including correspondence;
- deliver the Company's Code of Ethics to the supplier / consultant, undertake the formal commitment to comply with the provisions contained therein and insert a specific clause of compliance with the Code of Ethics in the consultancy contracts, in order to sanction any conduct contrary to corporate ethical principles ;
- not to pay or offer, directly or indirectly, payments and material benefits of any size to influence or compensate for an act of their office;
- not to carry out illegal, collusive practices and behaviors, illicit payments, attempts at corruption and favoritism;
- avoid exchanging courtesy gifts or acts of hospitality that do not have an eminently symbolic value;
- not to recognize fees that are not justified based on the type and nature of the assignment or in local practice.

7.3 COMPUTER SYSTEM MANAGEMENT

General Principles

The Company condemns any behavior consisting in the alteration of the functioning of a computer or telematic system or in the access without right to data, information or programs contained therein, aimed at procuring the Company an unfair profit to the detriment of the State.

The Company also condemns any possible behavior that may, even if only indirectly, facilitate the perpetration of computer crimes; to this end, the Company undertakes to activate all the preventive and subsequent control methods necessary for the purpose.

Operating rules

It is forbidden to:

- install, download and / or use computer programs and tools that allow to alter, forge, falsely certify, suppress, destroy and / or conceal public or private IT documents;

- install, download and / or use computer programs and tools that allow the illegal introduction into computer or telematic systems protected by security measures or that allow their stay (without having authorization) inside them, in breach of the measures put in place to protect them by the owner of the data or programs that are intended to be preserved or kept confidential;
- find, disseminate, share and / or communicate passwords, access keys, or other means suitable for allowing the conduct referred to in the preceding two points;
- use, find, disseminate, share and / or communicate the methods of use of equipment, devices or computer programs aimed at damaging or interrupting an IT or telematic system;
- use, retrieve, disseminate, install, download, share and / or communicate the methods of use of equipment, devices or computer programs aimed at intercepting, preventing or unlawfully interrupting computer or telematic communications, even if they occur between multiple systems;
- destroy, damage, cancel, totally or partially render useless, alter or suppress data or computer programs of others or a serious obstacle to their functioning;
- use, install, download and / or communicate techniques, programs or IT tools that allow you to change the server field or any other information relating to it or that allow you to hide the sender's identity or change the settings of the IT tools supplied by the Company;
- use file sharing software and, in general, applications and IT systems not provided and / or expressly authorized by the Company.

7.4 USE OF BANKNOTES, LEGAL TENDERS TAX STAMPS

General Principles

The Company, sensitive to the need to ensure fairness and transparency in the conduct of business, requires that the Recipients comply with the current legislation on the use and circulation of currency, public credit cards and stamps, and therefore severely sanctions any conduct aimed at the illegal use as well as the circulation of credit cards, revenue stamps, fake coins and banknotes.

Operating rules

Those who detect behavior, even potentially in conflict with the principles and rules in question, must inform their Manager and / or Top Management, as well as the Supervisory Body, who will proceed with the utmost solicitude and confidentiality to carry out all the actions that they will deem appropriate.

7.5 TOOLS AND SIGNS OF RECOGNITION AND PROTECTION OF COPYRIGHT RIGHTS

General Principles

The Company safeguards intellectual property rights, including copyrights, licences, trademarks and identification marks, by complying with the policies and procedures envisaged for their protection and also respecting the intellectual property of others, in every activity of the Company, with particular reference to the management of marketing strategies and policies.

The unauthorized reproduction of software, documentation or other materials protected by copyright is therefore contrary to the Company's policies. In particular, the Company complies with the restrictions specified in the license agreements relating to the production / distribution

of third party products, or those stipulated with its software suppliers and prohibits the use or reproduction of software or documentation not falling within each of said license agreements.

The Company prohibits any conduct aimed at determining the loss, theft, unauthorized dissemination or improper use of one's own or others' intellectual property or confidential information. To this end, the Company undertakes to activate all the preventive and subsequent control methods necessary for the purpose, ensuring compliance with copyright legislation, as well as the protection of identification marks, such as trademarks and licences. The Company also condemns the extraction, reproduction of data, public presentation, etc. of the contents taken from databases, as well as the use of the latter for different purposes for which they were established and, in any case, contrary to the provisions of the legislation on the protection of copyright.

The Company condemns any conduct carried out in order to illegally take possession of trade secrets, lists of suppliers and other information related to the economic activity of third parties.

Operating rules

The unauthorized reproduction of software, documentation or other materials protected by copyright is prohibited and, at the same time, the Recipients of the present Code undertake to comply with the restrictions specified in the license agreements relating to the production / distribution of products of third parties, namely those stipulated with their software suppliers.

It is also forbidden to use or reproduce software or documentation outside the constraints of each of these license agreements.

7.6 TERRORISM AND SUBVERSION OF THE DEMOCRATIC ORDER

General Principles

The Company, aware of the particular historical moment, requires its employees, and the Recipients in general, to pay the utmost attention and diligence in the performance of their tasks, and to monitor the timely and rigorous application of the procedures and control measures in force.

The Company requires compliance with all laws and regulations that prohibit the carrying out of terrorist activities as well as subversion of the democratic order, therefore it also prohibits simple membership of associations with these purposes.

Operating Rules

The Company prohibits the use of its resources for financing and carrying out any activity aimed at achieving terrorist objectives or subversion of the democratic order, and undertakes to adopt the most appropriate control and supervisory measures in order to prevent any possible behavior aimed at committing such crimes.

It is also expressly forbidden for each employee of the Company, wherever operating or located, to get involved in any practice or other action suitable for integrating terrorist conduct or subversion of the legal system.

In case of doubt, or if a situation appears ambiguous, each employee is required to contact his department Manager, the Legal Department, the Top Management, or the Supervisory Body.

Techimp also urges the Recipients to promptly report any circumstance that may reasonably be considered suspicious, to their Manager / Company contact person, to the top management, to the Supervisory Body, as well as, where appropriate, to the police.

7.7 PROTECTION OF INDIVIDUAL PERSONALITY

General Principles

The Company condemns any possible behavior aimed at committing crimes against the individual, such as, for example, reduction or maintenance in slavery or servitude, child prostitution, child pornography, possession of pornographic material, tourism initiatives aimed at the exploitation of child prostitution, etc. . and undertakes to adopt the most appropriate supervisory measures in order to prevent the commission of such offenses, as well as any form of financing that may favor or feed such practices.

The Company condemns any form of exploitation or reduction in a state of subjection of the person, taking advantage of the state of need of the same, and intends instead to ensure working conditions of maximum dignity, respectful of the legal requirements and aimed at avoiding any situation of exploitation or serious danger.

Techimp does not accept and condemns any conduct aimed at promoting ideas based on racial or ethnic hatred, incitement to discrimination, violence for ethnic, national or religious reasons, participation or assistance to organizations or groups having among their purposes the incitement to discrimination or violence for racial, ethnic, national or religious reasons.

Any Recipient who, in the context of their work activities, becomes aware of the commission of acts or behaviors that may favor the injury to personal safety, constitute exploitation or reduction in a state of subjection of a person or configure forms of racism or xenophobia, must immediately notify their superiors and the Supervisory Body.

7.8 ACTIVITIES AIMED AT HANDLING OF STOLEN ASSETS, MONEY LAUNDERING, USE OF MONEY, GOODS OR UTILITIES OF ILLICIT NATURE AND SELF-LAUNDERING

General Principles

The Company carries out its business in full compliance with the anti-money laundering regulations in force and the provisions issued by the competent Authorities.

In compliance with the applicable legislation, the Company undertakes to avoid carrying out suspicious transactions in terms of correctness and transparency and to verify in advance the information available relating to customers, suppliers, external collaborators and agents, in order to verify the respectability and the legitimacy of their activity, as well as to activate all the preventive and subsequent control methods necessary for the purpose.

Operating rules

The Recipients of the present Code are required to:

- verify, as far as possible in advance, the information available on users, counterparties, partners, suppliers, and consultants, in order to assess their reputation and legitimacy of the activity before establishing any relationship with them that involves obtaining goods or sums of money;

- operate in such a way as to avoid the establishment of any relationship or operation suitable, even potentially, to favor the laundering of money deriving from illegal or criminal activities, acting in full compliance with primary and secondary anti-money laundering legislation and internal control procedures prepared for such purpose.

For the purposes described above, collections and payments must preferably be made through bank transfers and / or bank checks issued with the non-transferability clause, and, in any case, strictly where required by law.

Each Recipient who carries out, on behalf of the Company, operations and / or transactions involving sums of money, goods or other economically valuable benefits must act with authorization, and provide on request all valid evidence for its verification at any time.

It is mandatory to provide for the monitoring of financial flows coming from outside, including the companies of the Group, and aimed at the investments necessary for the performance of the business activity and / or on the occasion of capital increases by the shareholders, in order to ensure a correct identification of the source of origin of the funding.

It is also envisaged that all Recipients are prohibited from:

- accepting money where there is even the doubt of its illicit / uncertain origin;
- accept goods and / or services and / or other utilities for which there is no suitably authorized order / contract;
- make or accept cash payments exceeding the threshold set by law (for this purpose payments made in several smaller amounts but concerning the same supply and overall exceeding the aforementioned threshold are also relevant).

Finally, the personnel who work on behalf of the Company is required to:

- to verify, as far as possible in advance, the information available on users, counterparties, partners, suppliers, and consultants, in order to assess their reputation and legitimacy of the activity before establishing any relationship with them that involves obtaining goods or sums of money;
- to operate in such a way as to avoid the establishment of any relationship, even if there is only doubt, aimed at favoring the laundering of money deriving from illegal or criminal activities, acting in full compliance with primary and secondary anti-money laundering legislation and internal control procedures prepared for such purpose.

Where a corporate function has the feeling of being faced with a suspicious transaction, or that has characteristics such as to make it seem artificial / unusual / anomalous, it must promptly inform the top Management and the Supervisory Body. In such cases, it will be necessary to evaluate the possibility of having to suspend it, refrain from carrying it out, collect more information, communicate the critical issues encountered by involving a higher hierarchical level, etc.

7.9 TRANSNATIONAL ACTIVITIES AND SAFEGUARD AGAINST ORGANIZED CRIMINALS

General Principles

The Company condemns any conduct, both on the national territory and at the transnational level, by subjects who hold a senior or subordinate role, which may even only indirectly facilitate the carrying out of criminal offenses such as criminal association, mafia-type association and the obstruction of justice, or determine possible violations of the further provisions against organized crime pursuant to art. 24-ter of Legislative Decree 231/2001.

To this end, the Company undertakes to activate all the necessary preventive and subsequent control methods (verifiability, traceability, monitoring, segregation of duties, etc.).

The Company also undertakes to control any form of internal association in order to reduce the risks of infiltration by criminal organizations and to prevent the occurrence of associative phenomena of an internal origin aimed at engaging in unlawful conduct and which make use of the means, resources and corporate assets for these purposes.

The Company promotes the development of legality within the territorial areas in which it operates; therefore it promotes participation in any memoranda of understanding (or similar agreements) defined between public entities, companies, trade associations and trade unions, aimed at preventing criminal infiltration.

Operating Rules

Business relationships must be maintained exclusively with customers, collaborators, partners and suppliers of a secure reputation, who carry out legitimate business activities and whose proceeds derive from legitimate sources. To this end, there are rules and procedures that ensure the correct identification of customers and the adequate selection and evaluation of suppliers or partners to collaborate with.

The Company adopts all the necessary control tools so that the decision-making centers within the Company act and decide by means of codified rules and keep track of their work (such as, by way of example, meeting minutes, reporting mechanisms, etc.).

7.10 PROTECTION OF COMPETITION

General Principles

The Company and all Recipients undertake to comply with antitrust regulations (which prohibit conduct aimed at limiting competition) and to avoid any unfair action against commercial counterparties (e.g. sabotage, falsification of technical, commercial and accounting documents and, in general, any fraud scheme).

The Company is committed not to undertake in any case aggressive or misleading commercial policies, aimed at influencing the customer in the purchase of their product through any form of physical-psychological intimidation or through a false communication on the product such as to mislead the customer.

The Company recognizes and promotes the value of free competition in a market economy as a decisive factor for growth, and therefore undertakes to operate in compliance with EU and national principles and laws aimed at protecting competition. Techimp intends to protect the value of fair competition by refraining from collusive and predatory behavior.

The Company inspires its conduct towards its competitors on the principles of loyalty and correctness and, consequently, stigmatizes and disapproves of any behavior that may hinder or disturb the operation of a business or trade or which may be connected to the commission of one of the crimes provided for by art. 25-bis.1 of Legislative Decree 231/2001 (Crimes against industry and trade).

The Company undertakes not to engage in unlawful, or otherwise unfair, conduct in order to take possession of trade secrets, lists of suppliers, or information relating to infrastructures or other aspects of the economic activity of third parties.

Furthermore, Techimp does not hire employees from competing companies for the sole purpose of obtaining confidential information, nor does it induce the staff or customers of competing companies to disclose information that they cannot disclose.

Operating rules

It is forbidden to enter into agreements with competitors on prices and methods of carrying out the services that may be harmful to free competition.

Commercial initiatives such as exclusive agreements, tied purchases, etc. they must be authorized by the top Management.

During the meetings with competitors in case of events, meetings, etc. organized by public bodies, user associations, trade associations as well as on all occasions where information is exchanged with competing companies, it is forbidden to engage in any behavior that could be judged as preparatory to activities detrimental to free competition (eg. agreements, including verbal ones, on the prices to be charged to consumers or on common methods of supplying the transport service).

Recipients are expressly forbidden from:

- use violence against things or use fraudulent means to hinder the industrial or commercial activity of others;
- carry out, in the exercise of an industrial, commercial or otherwise productive activity, acts of competition by resorting to violence or threats;
- perpetrate conducts capable of causing harm to national industries by selling or in any case putting into circulation, on national or foreign markets, industrial products with counterfeit or altered names, trademarks or distinctive signs;
- participate in meetings on behalf of the Company, in which prices or other aspects related to tariff practices are established, where such participation has not been previously assessed and authorized by the competent subjects;
- deliver to the buyer, in the context and / or in the exercise of a commercial activity, a movable thing for another (aliud pro alio) or a movable thing that is different in origin, provenance, quality or quantity compared to that declared or agreed;
- sell or otherwise put into circulation intellectual property or industrial products bearing names, trademarks or distinctive signs - national or foreign - capable of misleading the buyer as to the origin, provenance or quality of the works themselves or the product;
- manufacture or use industrially objects or other goods made by usurping or violating the industrial property title, while being able to know of the existence

of the same, as well as trying to profit from the aforementioned goods by introducing them into the territory of the State, holding them and / or placing them in sale or otherwise putting them into circulation;

- sell or otherwise market non-genuine food substances as genuine;
- counterfeit or in any case alter geographical indications or designation of origin of food products, introduce in the territory of the State, hold for sale, put up for sale with a direct offer to consumers or otherwise put into circulation the same products with counterfeit indications or names.

7.11 MANAGEMENT OF DATA AND ACCOUNTING, PROPERTY AND FINANCIAL COMPANY INFORMATION

General Principles

The Company condemns any conduct by anyone aimed at altering the correctness and truthfulness of the data and information contained in the financial statements, reports or other corporate communications required by law, addressed to shareholders and the public.

Techimp is aware of the importance of transparency, accuracy and completeness of accounting information and strives to have a reliable administrative-accounting system and to provide the tools to identify, prevent and manage, as far as possible, risks of a financial and operational nature, as well as fraud to the detriment of the Company.

Operating rules

All accounting records and any other document concerning Techimp's economic, equity and financial information must:

- a) be based on the principles of truthfulness, accuracy and completeness of the related data resulting from the supporting documentation which, in turn, must be complete and subject to verification;
- b) be held in accordance with the provisions of current legislation and company procedures;
- c) be sorted according to criteria that allow easy retrieval and consultation, a timely reconstruction of the operation to which they refer, as well as the identification of the different levels of responsibility.

All the subjects called to form the aforementioned documents are required to verify, with due diligence, the correctness of the data and information that will then be incorporated for the drafting of the documents indicated above.

All the items in the financial statements, whose determination and quantification presupposes discretionary assessments by the relevant departments, must be supported by legitimate choices and suitable documentation.

The accounting records and documents must be based on precise, exhaustive information, must reflect the nature of the transaction to which they refer in compliance with external constraints (legal provisions and accounting principles), as well as the policies, plans, regulations and internal procedures; in addition, they must be accompanied by the relevant supporting documentation necessary to allow objective analysis and audits.

The control bodies have free access to data, documents and information necessary to carry out their activities.

In order to allow or facilitate the performance of these activities, it is the duty of each person involved, within the limits of their competences and powers, to cooperate fully.

With particular regard to the preparation of the financial statements, other accounting records and documents concerning the economic, equity and financial situation of Techimp, it is forbidden to enter misleading or false entries.

Anyone who becomes aware of omissions, falsifications or lack of accuracy in the management of the accounting and documentation on which the accounting records are based, is required to immediately notify:

- employees have the duty to inform their manager or, if this is not possible for reasons of expediency, directly the top Management;
- external consultants of the Company are required to inform their internal contact in Techimp, or, if this is not possible for reasons of expediency, the top Management;
- the Managers are required to inform the top management directly.

7.12 TAX TRANSPARENCY

General Principles

The Company considers the payment of taxes to be a fundamental contribution to national economies and to the community, as well as a link between Techimp and the countries and communities in which it operates.

For these reasons, the Company condemns any conduct aimed at tax evasion and undertakes to properly and regularly fulfill tax obligations, seeking and developing, where possible, relations with the tax authorities based on maximum transparency and mutual respect.

Techimp does not in any way encourage the adoption of fraudulent behavior aimed at allowing tax evasion; in particular, the achievement of the objectives of the company personnel is in no way commensurate with the containment of the tax impact on the company.

7.13 CORPORATE COMMUNICATIONS

Operating rules

Each employee is required to collaborate with the Board of Statutory Auditors, as well as, if different, with the person in charge of the statutory audit, providing all information and / or data on the economic, equity and financial situation of the Company, acquired and / or known within the of carrying out the activities of its competence, in a timely, clear, correct and without reticence.

The members of the Board of Directors, the Board of Statutory Auditors and the person in charge of the legal audit of the accounts conform their activities to the provisions and principles of this Code, in addition to compliance with current legislation.

The procedures for convening, functioning and minutes of the meetings of the Assembly and the Board of Directors must be based on criteria and procedures that ensure maximum

information and participation for all interested parties and compliance with the provisions of the law.

The Company verifies the truthfulness of the accounting records and their compliance with the provisions of the civil code, tax regulations and the relevant legislation through the corporate bodies and corporate functions concerned from time to time, as well as through the statutory auditor.

It is in Techimp's interest, as well as its corporate policy, that current legislation, including tax and fiscal legislation, is respected, both by its employees and by subjects, including external ones, who provide fixed or occasional consultancy to the Company.

7.14 DEALING WITH COMPANY INSPECTION BODIES

General Principles

Relations with the Board of Statutory Auditors, the Supervisory Body and any other corporate bodies must be based on the utmost cooperation and transparency, any non-conforming behavior is prohibited.

Operating rules

The Company requires all personnel to observe correct and transparent conduct in the performance of their duties, especially in relation to any request made by shareholders, the Board of Statutory Auditors and other corporate bodies in the exercise of their respective control functions.

7.15 PROTECTION OF THE COMPANY'S ASSETS AND CREDITORS

Operating rules

It is forbidden to engage in any conduct aimed at causing damage to the integrity of the corporate assets.

Any behavior aimed at reducing the share capital or merging with another company or division in order to cause damage to creditors is prohibited.

7.16 CONFLICT OF INTERESTS OF CORPORATE DIRECTORS

Operating rules

Each Director is obliged to inform the first useful shareholders' meeting and the Board of Statutory Auditors, about any interest, on his own behalf or on behalf of third parties, he has in a specific transaction by the company on which he is called to decide. This communication must be precise and timely or must specify the nature, terms, origin and extent of the interest itself.

7.17 INFLUENCE ON THE SHAREHOLDERS 'MEETING

Operating rules

It is forbidden to carry out any act, simulated or fraudulent, aimed at illegitimately influencing the will of the members of the shareholders' meeting in order to obtain the irregular formation of a majority and / or a resolution other than that which would otherwise have been adopted.

8 CONFIDENTIALITY AND DISSEMINATION OF INFORMATION AND NEWS

8.1 COMMUNICATION AND DISSEMINATION OF INFORMATION

Operating rules

All information and documents learned in carrying out activities in favor of Techimp are confidential.

Therefore, for all employees of the Company, and for those who work in the name and on behalf of the same, there is an obligation of confidentiality of the data and information which, by reason of their assignment, they are in possession of, and are subject to the prohibition to disclose such information.

By way of example, information related to management plans, production processes, products and systems developed or, in any case, managed and / or maintained, as well as information relating to negotiated and insolvency procedures, in addition to all databases and information and data relating to personnel must be considered as such.

All Techimp documentation must be archived in accordance with the data protection methods indicated in the internal provisions and in the measures adopted by the Company for data security.

Violations by all employees and those who work in the name and on behalf of the Company will be subject to the relative disciplinary sanctions provided for by the internal disciplinary code as well as to any other measures that may be deemed necessary.

Diligence and attention are required in the use of telematic communication tools, exchange of messages and information and in accessing the corporate and / or public network. Everyone is therefore required to comply with the regulations and provisions on the use of these tools and services.

The information to be communicated to third parties must be transmitted in a correct, transparent and truthful manner: it is therefore forbidden to disseminate - both inside and outside the Company - information concerning the Company, its employees, consultants, collaborators and third parties who work for it.

8.2 DATA PROTECTION

General Principles

Techimp, in carrying out its business, collects, manages and processes personal data in compliance with current legislation.

In particular, the Company undertakes to comply with the mandatory obligations provided for by the laws and regulations on the protection of personal data and to adopt a privacy management system that allows for an organizational and risk control model to be available for processing of personal data.

The privacy of the employee and the collaborator is protected by adopting standards that specify the information that the Company requests from the subject and the related processing and storage methods, suitable for ensuring maximum transparency to the directly concerned and inaccessibility to third parties, if not justified reasons.

Operating rules

All Recipients are required to respect the confidentiality of the data and information which, by reason of their assignment, they are in possession of; it is forbidden to disclose or facilitate the disclosure of such information.

It is forbidden to process data in violation of the current legislation on the protection of privacy.

Any data processing that has the purpose of carrying out surveys on ideas, preferences, personal tastes and, in general, the private life of collaborators is prohibited.

It is also forbidden, except in the cases provided for by law, to communicate / disseminate personal data without the prior consent of the interested party.

With regard to the processing of data on paper and through the use of IT systems, it is mandatory to comply with the particular security measures in place in order to prevent the risk of unauthorized use, external intrusions (such as, for example, checks on access to the premises, password, personal identification code, screen saver, etc.), as well as loss, even accidental, of data.

Sensitive, proprietary or confidential information is stored in secure files on company servers, in line with Techimp's internal regulations.

The security measures are arranged with specific instructions given by the data controller.

Violation of the privacy rules may result in the application of disciplinary measures in relation to the extent of the violation.

9 IMPLEMENTING RULES, CONTROL AND DISTRIBUTION

9.1 INTERNAL AUDITS

All of Techimp's activities and operations must be carried out in compliance with current legislation, company processes, procedures and guidelines and the principles contained in this Code. Each operation must be adequately supported on a documentary level so that checks can be carried out at any time that certify the characteristics and reasons for the operation and identify who authorized, recorded and verified the operation itself.

The audits carried out by the Company are aimed at:

- a) assess the compliance of the behavior of employees with the rules of the Code, the processes, procedures and guidelines adopted by Techimp and intervene in the event of violation of the same by adopting the measures deemed appropriate from time to time;
- b) periodically check that the procedures and company organization comply with current legislation and are adequate in terms of efficiency, effectiveness and cost-effectiveness;
- c) verify the correct administration of the Company in compliance with current legislation.

The audits are carried out by the relevant functions, by the Chief Executive Officer, the Board of Directors, the Board of Statutory Auditors, the Statutory Auditor and the Supervisory Body as far as their respective competence is concerned; all operations connected with these control activities must be adequately documented

9.2 SUPERVISORY BODY

The Supervisory Body is responsible for monitoring the implementation and updating of the Organization, Management and Control Model and the Code of Ethics.

The Supervisory Body in the exercise of its functions has free access to company data and information useful for carrying out its activities.

The corporate bodies and their members, employees, consultants, collaborators and third parties acting on behalf of the Company, are required to collaborate fully in favoring the performance of the functions of the Supervisory Body.

9.3 PENALTIES

Failure to comply with the principles contained in the present Code may result in the application of the sanctions contained in the corporate Disciplinary System within the limits and according to the specific procedures provided therein. The seriousness of the infringement will be assessed on the basis of the following circumstances:

- a) the timing and concrete methods of carrying out the infringement;
- b) the presence and intensity of the intentional element;
- c) the extent of the damage or danger as a consequence of the infringement for the Company and for all employees and stakeholders of the Company itself;
- d) the predictability of the consequences;
- e) the circumstances in which the infringement took place.

The recidivism constitutes an aggravating circumstance and involves the application of a more serious sanction.

9.4 INTERNAL REPORTING

In the event of news of possible violations of the Code and / or of the operating procedures that constitute the Model or of other events likely to alter its value and effectiveness, everyone must contact their Manager, who will communicate with the competent Management or, if this is not possible for reasons of expediency, directly to the top Management. In any case, the violation must also be promptly reported to the Supervisory Body through the use of the following dedicated communication channels:

- e-mail address specifically dedicated to communications to the Supervisory Body: odvtechimp@gmail.com.
- traditional mailing address: for the attention of the Supervisory Body of Techimp Impianti S.p.A., via Stentinello, 9 Contrada Targia - 96100 Siracusa (SR).

Not reporting a violation of this Code can be considered a form of concurrence in the violation itself.

It is not allowed to conduct personal investigations or to report information to other subjects other than those specifically appointed.

All those who have received news of the violation are required to protect the whistleblower from any pressure, intimidation and retaliation, also ensuring the confidentiality of the identity of the same, without prejudice to legal obligations and the protection of the rights of the Company or of the persons wrongly accused or in bad faith.

It is in fact forbidden for anyone to retaliate against the whistleblower, by means of retaliation or discriminatory acts, direct or indirect, for reasons connected, directly or indirectly, to the report.

Anyone who contravenes this prohibition or makes the aforementioned reports with willful misconduct or gross negligence which turn out to be unfounded will be subject to disciplinary measures provided for by the applicable regulations.

Any report of conduct in violation of the Code of Ethics will be verified and ascertained by the SB in accordance with the provisions of company policies, the Model and the disciplinary system adopted by the Company.

9.5 AWARENESS

The present Code is brought to the attention of the members of the corporate bodies, employees, consultants, collaborators and any other third party who may act on behalf of the Company. All the aforementioned subjects are required to learn its contents and to respect its precepts.

Any application doubts related to the present Code must be promptly submitted and discussed with the Supervisory Body.

10 FINAL PROVISIONS

10.1 CONFLICT OF CODES PROVISION

Should even just one provision of the Code of Ethics be in conflict with the provisions of internal regulations or procedures, the Code shall prevail over these provisions.

10.2 MODIFICATIONS TO THE CODE

Any changes and / or additions to the present Code of Ethics must be made and approved with the same procedures adopted for its initial approval.

DECLARATION OF ACKNOWLEDGEMENT CCEPTANCE AND ACCEPTANCE OF THE ORGANIZATION, MANAGEMENT AND CONTROL MODEL AND OF THE CODE OF ETHICS OF TECHIMP IMPIANTI S.P.A.

The Declaration of acknowledgment and acceptance of the Organization, management and control model (for employees) and of the Code of Ethics must be signed by the recipients each time these documents are updated.

The signed declaration is kept by the Management that manages relations with the signatory.

"I, the undersigned, declare that I have received, read and understood my personal copy of the Code of Ethics [and the Organization, management and control model] adopted by Techimp Impianti S.p.A. pursuant to Legislative Decree no. 231/2001.

I also declare that I have understood, accepted and undertake to respect the principles and rules of conduct contained [in the Organization, management and control model and] in the Code of Ethics.

I therefore undertake to conform my behavior to the rules [in the Organization, management and control model and] in the present Code, recognizing the responsibilities associated with violations of these rules. "

Name and Surname (legible signature in full)

Role / Qualification (e.g., employee, collaborator, consultant, supplier, etc.)

Signature

Day