



CODE OF ETHICS

“OUR GREATEST CHALLENGE IN THIS NEW CENTURY IS TO ADOPT AN IDEA THAT SEEMS ABSTRACT - SUSTAINABLE DEVELOPMENT.”

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DOCUMENT CONTROL		
APPROVED BY	DATE RESOLUTION	SIGNATURE
BOARD OF DIRECTORS	06/12/2021	<i>Jimmie G. Smith</i>
REVISION REFERENCES		
REVISION (REV)	REVISION DATE	REVISION STATUS
REV 01	03/11/2022	APPROVED <i>Jimmie G. Smith</i>

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## **MISSION**

*Our goal is to become a leading company in our areas of business. Always remaining attentive to our customers' needs and striving to offer them reliability and flexibility.*

## **1. PURPOSE AND CONTENT OF THE CODE OF ETHICS**

This Code of Ethics (hereinafter referred to as the Code) is an official document of the T.E.A.TEK Group approved by the Administrative Body of each Group Company and sets out the general principles and rules of conduct to which all those who operate within the corporate context and with the Group Companies are subject.

The Code is an integral part of the Organisational, Management and Control Models pursuant to Italian Legislative Decree (D. Lgs.) 231/01 adopted by the Group Companies and, as such, constitutes one of the tools aimed at preventing the offences envisaged by Italian Legislative Decree (D. Lgs.) 231/01.

The main purpose of the Code is to direct the actions of Group companies towards ethical conduct inspired by the value principles, compliance with which is an essential condition for achieving the corporate mission of each of them.

A further aim is to prevent the commission of unlawful acts or irresponsible behaviour that could be committed by those who work in the name of or on behalf of the companies; finally, compliance with the Code must be a positive return for the Group's image, reputation and credibility in its external relations and be a source of inspiration and trust for stakeholders.

## PRINCIPLES TO WHICH THE T.E.A.TEK GROUP ASPIRES

**Responsibility:** all the operations carried out and the conduct of the Addressees in the performance of their functions or duties are inspired by the assumption of individual responsibility, binding each Addressee to provide professional contributions appropriate to the responsibilities assigned and to act in such a way as to protect the reputation and good name of the T.E.A.TEK Group.

**Transparency:** observance of this principle implies a commitment to provide the due information, both outside and inside the Group, in a clear and complete manner, adopting a verbal or written communication that is easy and immediately comprehensible and subject to verification of the requirements of truthfulness, clarity and completeness of the information itself. In the information provided to customers, as well as in the formulation of contracts, the Group communicates in a clear and comprehensible manner, always ensuring the maintenance of equal conditions.

## 1.1. CORRELATION OF THE CODE OF ETHICS WITH CERTIFIED MANAGEMENT SYSTEMS

This Code aims to harmonise the ethical values inspiring the company's work with the requirements of the certified management systems adopted by T.E.A.TEK, as listed below:

- requirements of the Quality Management System in compliance with UNI EN ISO 9001:2015
- requirements of the Environmental Management System in compliance with UNI EN ISO 14001:2015
- requirements of the Occupational health and safety Management System in compliance with the UNI EN ISO 45001:2018
- requirements of the Anti-bribery Management System in compliance with the UNI EN ISO 37001:2016.

## 1.2. SOCIAL ACCOUNTABILITY

In order to strengthen its commitment in the social sphere and promote values of integrity and business ethics, the Group operates in accordance with the Social Accountability Management System, implemented by T.E.A.TEK S.p.A. according to the international standard SA 8000.

The Group is committed to:

- Rejecting the employment of child labour
- Rejecting the use of forced and compulsory labour
- Protecting the health and safety of workers and their well-being
- Respect the right to freedom of association and collective bargaining

## PRINCIPLES TO WHICH THE T.E.A.TEK GROUP ASPIRES

**Fairness:** the principle of fairness implies respect for the rights of all persons involved in the business activity, beyond mere compliance with the Law, the Labour Contract or other contracts applicable from time to time. The Addressees must always conform their conduct to the company provisions and procedures in compliance with the rules established by law and by the contracts in force with the Group Companies. The conduct of apical persons (directors, auditors, managers, etc.) must always be characterised by fairness and equity, as they constitute reference models for all.

**Competition:** The Group guarantees the value of competition, operating according to principles of fairness, fair competition and transparency towards all operators and competitors in the market, in this sense recognising as a primary need the protection of its own and third parties' industrial and intellectual property rights.

- Respect the right to a decent wage and fair working hours
- Respect the principles of dignity, equality and non-discrimination
- Prohibiting unfair disciplinary practices.

The Group is committed to ensuring that the principles of Social Accountability are disseminated, understood and respected by workers, supply chain members and all stakeholders, promoting their involvement and hoping for constructive interaction.

## 2. ADDRESSEES AND DISSEMINATION OF THE CODE

The addressees of this Code are the shareholders, directors of each Group company, their managers, employees, consultants and anyone (individuals, entities or third party companies) who, for any reason, directly or indirectly, permanently or temporarily, establish collaborations or partnerships with them.

The addressees of the rules of the Code are obliged to observe the prescriptions contained therein and to adapt their conduct and actions to the principles expressed.

To this end, the Code is published on the corporate website and made available to any Group stakeholder.

## 3. EFFECTIVENESS OF THE CODE

The conduct prescribed by this Code integrates, from an ethical point of view, the conduct relevant to the full and proper fulfilment of the obligations of loyalty

### PRINCIPLES TO WHICH THE T.E.A.TEK GROUP ASPIRES

**Efficiency:** Recipients shall instil the best professional quality in each work activity according to the most advanced standards in each sector and activity profile. In business performance and service provision, the commitment to offer a service tailored to the customer's needs while respecting the standards of cost-effectiveness in the management of the resources employed must always be pursued.

**Spirit of service:** Recipients must interact with each other with solidarity and mutual respect, collaborating on each other's work/professional activity, in order to guarantee a service of high social value and usefulness to the community, without any arbitrary discrimination.

and diligence expected of directors, managers and employees, as well as the general obligation of good faith required of collaborators in any capacity and of suppliers of goods or services.

Therefore, the Addressees of the Code are obliged to comply with its provisions both in their direct relations with the Group and in their reciprocal relations, and under no circumstances does the intention to act in the interest and/or to the advantage of one of the Group's companies justify actions, omissions or conduct contrary to the principles and values enshrined in the Code

#### 4. IMPLEMENTATION AND UPDATES OF THE CODE

The Code is adopted by each Group company by resolution of its administrative body and may be amended and supplemented by the same body also on the basis of suggestions, indications and proposals that may be made by the supervisory board named *Organismo di Vigilanza* (see below), appointed pursuant to Italian Legislative Decree (D. Lgs.) 231/2001. On October 21st, 2022 the Board of *Unione Industriale Napoli* approved T.E.A.TEK as its associate. T.E.A.TEK adheres to and complies with the Code of Ethics of *Unione Industriale* - approved by the *Confindustria* Board of June 19th, 1991. For this reason, considering the Code integrated and updated.

#### 5. CRITERIA OF CONDUCT IN RELATIONS WITH STAKEHOLDERS

## PRINCIPLES TO WHICH THE T.E.A.TEK GROUP ASPIRES

**Occupational health and safety protection:** Group companies promote an organisational and management structure of occupational safety that is suitable for preventing any accident, in compliance with the relevant regulations, developing risk awareness and promoting responsible behaviour by all personnel. They also ensure that any assignment in the field of occupational safety and hygiene to third parties, whether external consultants or companies, is assigned exclusively on the basis of proven and adequate skills and experience in the field.

**Environmental protection:** The T.E.A.TEK Group is attentive to environmental issues and is aware of the strategic role of the environment as a corporate enhancement tool.

The following are the principles and values that T.E.A.TEK lays down as the basis for decisions affecting relations with the various categories of *stakeholders* and that must characterise the behaviour of all the people in its organisation.

### 5.1. GENERAL PRINCIPLES

The Group acts in compliance with the regulations in force, as well as in accordance with the corporate principles of Business Conduct and the procedures prearranged for this purpose. For this reason, each Group company requires its directors, managers, employees, partners and, in general, anyone who in any capacity represents the interests of the company, also de facto:

- ✓ compliance with the regulations in force, as well as with the company principles and procedures applicable to the activity performed from time to time;
- ✓ proper conduct that does not undermine the moral and professional reliability of Group companies and individual agents.

### 5.2. RELATIONS WITH MEMBERS

The Group creates the conditions so that shareholders' participation in the decisions within their competence is widespread and conscious, promotes equality of information and guarantees shareholders full protection from any operation that may be decided and executed by the directors in conflict of interest with the administered company.

At the same time, it repudiates any form of covert exercise of management power by shareholders, taking care that they do not interfere with the work of the administrative body.

### **5.3. RESPECT FOR PERSONS AND THEIR FUNDAMENTAL RIGHTS**

The Group is committed to maintaining a behaviour geared towards safeguarding the dignity, freedom and equality of human beings, the protection of labour and trade union freedoms, and the health and safety of its human resources, and guarantees a working environment in which personal characteristics and orientations cannot give rise to discrimination of any kind

The Group pays special attention to the selection and recruitment of employees, ensuring respect for the values of equal opportunities, merit and equality in line with the relevant legal requirements, the Workers' Statute and the applicable collective bargaining agreements.

This process includes the verification of the correspondence between the profile of the various candidates and the company's needs, carried out in compliance with the principles of the law and compulsory recruitment of personnel belonging to protected categories. The recruitment of the selected candidate presupposes the regular signing of the applicable employment contract, which indicates all the fundamental elements of the relationship established.

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#### ***5.3.2. PERSONNEL MANAGEMENT***

All employees are hired with a regular employment contract and each Group company guarantees their right to a decent salary, taking care of their social security, contribution and insurance treatment as provided for by the regulations and employment contracts in force. In this sense, T.E.A.TEK opposes any form of favouritism, nepotism or discrimination.

The management of the relationship and the choice of type of employment contract is based on a careful assessment of the workers' profile, taking into account any requests they may have, and adopting, where possible, flexible contractual models in accordance with current legislation.

Hierarchical power is exercised in full respect of workers' rights, with objectivity and balance. Similarly, the Staff shall provide the utmost cooperation in observing the instructions given on the job by the 'apical' subjects and assuming the utmost diligence and expertise in the performance of the tasks entrusted to them, in compliance with Art. 2104 of the Italian Civil Code. Personnel are also bound by the obligation of loyalty towards the Company and the



Group, and may not perform activities contrary to the interests of the Company they belong to or of the Group, or incompatible with their official duties.

T.E.A.TEK refrains from irregular or undeclared forms of work, does not use child labour, repudiates forced and compulsory labour, and respects the applicable laws and standards on working hours, holidays and festivities.

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### **5.3.3. USE OF COMPANY ASSETS**

The documents, work tools, equipment, computer or analogue equipment and any other tangible or intangible asset (including intellectual property rights, trademarks, patents or other industrial property titles) pertaining to the Group Companies shall be used exclusively for the fulfilment of institutional purposes, in the manner established by the individual Companies. Such *assets* may not be used by employees or other recipients of this Code for personal purposes, nor may they be transferred or made available to third parties, and must be used and guarded with the same care and diligence as one's own assets.

## **5.4. RELATIONS WITH THE PUBLIC ADMINISTRATION**

Relations with public officials, persons in charge of public services, public employees and the public administration in general are characterised by the utmost transparency, loyalty and fairness.

T.E.A.TEK repudiates corruption in all its forms and requires its stakeholders to strictly abstain from any conduct likely to influence the good performance and impartiality of the Public Administration, especially if aimed at obtaining any undue advantage for themselves, the company they belong to or their Shareholders.

In particular, any form of unlawful pressure exerted on Public Administration representatives called upon to adopt measures of interest to the Company to which they belong shall be considered contrary to the provisions of the Code and, therefore, circumventing the Organisational, Management and Control Model of the risk of offences adopted by the individual Companies pursuant to Italian Legislative Decree (D. Lgs.) 231/01.

Furthermore, it is forbidden to offer improper payments, offer or procure undue gifts and services, or any other advantage to public officials, employees of public institutions, for themselves or for their relatives and family members. In relations with public officials, it is

forbidden to be represented by consultants or third parties that may be in conflict of interest with the Administration itself. It is forbidden to engage in any conduct that, through deception, is aimed at obtaining undue advantages for persons and/or Group companies against unjust damage or disbursement to the assets of public institutions, the State or the Region.

The requirements set out above must not be circumvented by resorting to various forms of aid and contributions that, in the guise of appointments, consultancy, advertising, etc., have similar purposes to those prohibited.

Each Group Company is therefore actively committed to representing its interests and positions in a transparent, rigorous and consistent manner, avoiding attitudes of a collusive nature; and avoiding falsification and/or alteration of statements or documentary data in order to obtain an undue advantage or any other benefit for the Company.

In the event of checks or inspections by the competent public authorities, the addressees must adopt an attitude of maximum helpfulness and cooperation towards the inspection and control bodies. In such hypotheses, the Group reiterates the obligation of all addressees to cooperate with the requests of judicial and/or police bodies with truthful and non-abusive declarations, providing all the information necessary to ascertain the facts.

## 5.5. CUSTOMER RELATIONS

The customer is T.E.A.TEK's point of reference: listening to and understanding their needs, continuously seeking to customise its offers, raising quality standards are, for the Group, essential priorities in order to increase the degree of satisfaction and satisfaction of its products and services.

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### 5.5.1 *CONTRACTS AND COMMUNICATIONS WITH CUSTOMERS*

In keeping with the stated objectives, contracts and communications with customers must be:

- ✓ clear and simple, formulated in a language as close as possible to that normally used by interlocutors;
- ✓ compliant with current regulations, without resorting to elusive or otherwise unfair practices;
- ✓ complete, so as not to overlook any element relevant to the customer's decision.

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### 5.5.2 QUALITY E CUSTOMER SATISFACTION

T.E.A.TEK is committed to ensuring the achievement of the required quality and safety standards and to periodically monitoring the quality of products or services provided to customers.

## 5.6 RELATIONS WITH SUPPLIERS, CONSULTANTS AND CONTRACTORS

All Company purchases must be made with fairness, integrity, confidentiality and diligence, ensuring in the procurement process compliance with all relevant corporate provisions, procedures and practices.

Recipients involved in the purchasing process, in the stipulation of contracts or in the conferral of tasks of any nature on behalf of the Group's companies, must act in accordance with the principles of impartiality and independence in the exercise of their functions, and must be free from personal obligations towards suppliers, contractors and/or consultants, refraining from conduct in which a conflict of interest may even potentially arise, or which may constitute a criminal offence or other offences.

The same Addressees must immediately report to the *Organismo di Vigilanza* (see below) any attempt to alter normal business relations made by counterparties.

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### 5.6.1 CHOISE OF SUPPLIER

The choice of supplier and the purchase of tangible and intangible goods and services must take place in accordance with the principles of transparency, competition, a level playing field between tenderers and on the basis of objective and documented assessments of competitiveness, quality, utility and price.

The Group adopts objective and transparent selection criteria and does not preclude any supplier, who meets the requirements, from competing for the signing of a contract.

In selecting the supplier, each Group company shall take into account the ability to guarantee the implementation of adequate company quality systems, the availability of organisational means and structures and the ability to meet the obligations of confidentiality and protection of any personal data processed on behalf of the company.

T.E.A.TEK reserves the possibility to adopt a supplier list whose qualification criteria do not constitute barriers to entry.

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### **5.6.2 OBLIGATIONS FOR PROCUREMENT PERSONNEL**

**Impartiality:** Procurement personnel shall ensure equal treatment of companies that come into contact with Group companies, refraining from any arbitrary act that might adversely affect companies as well as from any preferential treatment.

**Confidentiality:** In order to protect the confidentiality of the information communicated by the companies that come into contact with the Group Companies, the above-mentioned personnel shall refrain from disseminating and using the information acquired for personal purposes.

**Independence and duty of abstention:** Each employee in charge of procurement does not carry out any activity conflicting with the correct fulfilment of his or her duties and avoids any involvement in situations that may harm the image of T.E.A.TEK. Furthermore, he/she must operate autonomously and avoid making decisions or carrying out activities inherent to his/her duties in situations, even if only apparent, of conflict of interest with the Company.

**Gifts and other benefits:** Personnel in charge of procurement shall not ask for or accept, for themselves or for others, gifts and other benefits offered by suppliers, consultants, contractors or companies competing with or otherwise interested in supplies and tenders issued by the Group Companies, with the exception of courtesy gifts related to holidays.

**Performance of contracts:** The assessment of compliance with contractual conditions is carried out objectively and must be evidenced by written documentation. The relevant accounting is concluded within the time limits set by the company's payment procedures inherent in the payment cycle.

## **5.7. RELATIONS WITH BUSINESS PARTNERS**

The sharing of this Code is a necessary prerequisite for the establishment and maintenance of business partnerships with third parties in any contractual form in which such relationships are conducted.

Business partners shall be selected from among persons of proven integrity, moral and professional honesty, competence and commercial soundness, and relations with them shall

be characterised by the utmost transparency, fairness and equity; all the information provided shall be truthful and complete and the utmost confidentiality of data and documents received or exchanged during negotiations and during the partnership relationship shall be guaranteed.

Group companies, in order to protect their image and safeguard their resources, do not establish business relations with parties who do not intend to operate in strict compliance with the regulations in force or who refuse to conform to the values and principles laid down in the Code and/or to comply with corporate policies and procedures.

## **5.8. INSTITUTIONAL RELATIONS AND WITH POLITICAL ORGANISATIONS**

Group companies undertake to represent their interests and positions with public institutions in a transparent, rigorous and consistent manner. In order to guarantee the utmost clarity in relations, contacts with institutional interlocutors take place exclusively through representatives who have received an explicit mandate from top management.

The Group does not in any way make contributions to political parties, movements, committees and organisations that have political and/or trade union aims, to their representatives and/or candidates, which are not permitted under current legislation.

## **6. HEALTH AND SAFETY**

Group companies are committed to spreading and consolidating a safety culture by developing risk awareness and promoting responsible behaviour by all personnel, at all levels. They also work to protect, especially through preventive actions, the health and safety of workers, as well as the interests of other stakeholders.

To this end, a capillary internal structure, attentive to the evolution of reference scenarios and the consequent change of threats and risks, carries out technical and organisational interventions, through the introduction of a risk and safety management system; a continuous analysis of risk, of the criticality of processes and resources to be protected; the adoption of the best technologies aimed at accident prevention; the control and updating of work methodologies; the provision of training and communication interventions.

Group companies strive to continuously improve the efficiency of company structures and processes that contribute to the continuity of prevention and protection services for workers.

The sense of responsibility, behaviour and attitudes towards the corporate aspects relating to the correct management of health and safety and environmental issues outlined below, are an integral part of the duties of personnel, at all levels, and are, therefore, a significant element of judgement on the performance of each employee and on the quality of the services rendered by third parties to Group Companies.

## 7. ENVIRONMENTAL POLICY

The definition of the environmental policy and its implementation are managed in a unified and consistent manner throughout the Group, and the guidelines for the implementation of the environmental policy are taken as a reference by the Group companies.

Group companies are committed to adopting strategies aimed at continually improving results in the field of environmental protection and management, focusing their efforts on preventing pollution and minimising environmental risks, operating in line with the following principles:

- to manage natural resources and energy in a sustainable manner, valuing their use, paying particular attention to the reduction of waste and rational use in energy consumption, increasing the use of renewable sources;
- design and implement work processes and company activities with criteria aimed at preventing pollution, reducing environmental impacts, preventing possible accidental events, safeguarding the health of employees and the population, adopting to this end the best techniques available on the market and verifying the reliability in the operation and maintenance of the plants;
- maintain and support the commitment to continuous improvement of results in the field of environmental protection and management, defining environmental objectives and adopting improvement programmes aimed, in particular, at optimising the capture, distribution and purification of water resources, the control and reduction of atmospheric and electromagnetic emissions, the containment of waste in the electricity distribution network, the minimisation of visual and acoustic impact caused by company plants as well as the reduction, recovery and re-use of waste produced;
- use suitable control tools and monitoring systems on the main environmental impacts generated by company activities and the improvement programmes adopted;

- operate through a safety and environmental management system that is as integrated as possible, both inside and outside the workplace, guaranteeing compliance with the environmental and safety legislation in force from time to time and constant updates on developments in the environmental legislative and regulatory panorama;
- sensitise, educate and suitably train the various levels of personnel, to achieve the involvement of all human resources, in order to achieve high levels of professionalism and quality of performance that impact on environmental, health and safety issues, pursuing the growth of awareness and sense of responsibility of the entire Group.

## 8. ACCOUNTING PRINCIPLES

Accounting transparency is based on the truth, accuracy and completeness of the basic information for the relevant accounting records. Each employee is obliged to cooperate to ensure that management facts are correctly and promptly represented in the accounts.

Administrative, accounting and financial processes are managed by ensuring the application of the following principles:

- segregation of roles and responsibilities at each stage of the process;
- traceability of activities in order to be able to reconstruct the activities carried out at any time;
- implementation of an ICS (internal control system) aimed at ensuring first and second level controls.

### 8.1. BUDGET

When preparing the financial statements or other similar documents, the top management of each Group company and all recipients in any case involved in such activity must: represent the economic, asset or financial situation with truth, clarity and completeness; facilitate in every way the performance of internal and external control activities; present to the shareholders' meeting complete deeds and documents corresponding to the accounting records; provide the Control Bodies with correct and complete information on the economic, asset or financial situation.

### 8.2. TAX OBLIGATIONS

Group companies undertake to fulfil with completeness and transparency all the tax obligations imposed on them by current legislation and to cooperate, where required, with the tax authorities. Tax declarations and the payment of taxes represent conduct that is not only compulsory from a legal point of view but also unavoidable in the context of the company's social responsibility.

Therefore, it is absolutely against the interest of the Group to violate tax regulations.

## 9. INFORMATION TECHNOLOGY

With regard to the company's IT equipment, staff are required to:

- to use the computer applications according to the instructions and for the purposes for which they are made available by the Group;
- scrupulously comply with the company's security policies, so as not to compromise the functionality and protection of IT systems;
- not sending threatening or insulting e-mail messages, not engaging in low-level language, not making inappropriate comments that may cause offence to persons and/or damage the corporate image;
- not surfing on websites with indecorous or offensive content.

The Group is committed to ensuring that the digital preservation and archiving of data and company documents takes into account the problems linked to digital obsolescence and works to ensure that digitally archived material is not lost with the advent of new technologies that do not 'recognise' previous supports.

The Group is committed to ensuring compliance with current legislation on confidentiality and personal data protection, with particular attention to the integrity and correctness of the data used and access control regulations.

the Group adopts protection mechanisms to guarantee the security of the data acquired in order to prevent cyber attacks.

## 10. IMPLEMENTATION MODALITIES AND SUPERVISORY PROGRAMME

The Group undertakes to bring the contents of this Code to the attention of all recipients by any useful and suitable means and to make it comprehensible and knowable to all those involved in



its activities. To this end, the Code of Ethics is published on the T.E.A.TEK website and made accessible to all stakeholders and interested third parties.

Group companies also envisage, in contracts with third parties, the introduction of specific contractual clauses and/or the signing of declarations aimed at formalising the counterparts' commitment to comply with the Code of Ethics, also with the effect of terminating the contractual relationship in the event of breach.

The Group is committed to defining responsibilities and activating procedures, practices or instructions to ensure that the values indicated above are reflected in the concrete behaviour of all Addressees, foreseeing, where appropriate, appropriate sanctions for any violations. Compliance with the rules of the Code must be considered an essential part of the contractual obligations of Personnel and all outsourcers working on behalf of the Group.

Therefore, the application of this Code is the personal responsibility of each Addressee. The latter, once informed, may not invoke as a justification for non-compliance the lack of knowledge of the Code or having received contrary instructions from any other member of the Group.

The values and principles contained in the Code of Ethics will be the subject of adequate training of Personnel, aimed at creating a consensus on the contents and providing tools for awareness and knowledge of the mechanisms and procedures for translating ethical principles into conduct to be kept in practice in daily operations.

## 10.1 SANCTIONS

Violation of the principles contained in this Code, where it also constitutes a disciplinary offence, shall give rise to disciplinary proceedings, irrespective of the possible initiation of criminal proceedings in cases where the offending conduct also constitutes a criminal offence.

Within the scope of contracts for the supply of goods or services and professional collaboration, express termination clauses shall be included pursuant to Art. 1456 of the Italian Civil Code in relation to conduct that is found to be contrary to the principles of this Code.

## 10.2. VIOLATIONS OF THE CODE OF ETHICS RELATED TO ITALIAN LEGISLATIVE DECREE (D. Lgs.) 231/2001

The adoption of the ethical principles relevant to the prevention of the offences provided for in Italian Legislative Decree (D. Lgs.) 231/2001 constitutes an essential element of the preventive control system that Group companies implement through the adoption and effective implementation of the Organisation, Management and Control Model pursuant to Italian Legislative Decree (D. Lgs.) 231/2001.

To this end, the rules of conduct set out in the Code constitute a basic reference to which the addressees must comply in their relations with their (public and private) interlocutors, and their breach may be sanctioned on the basis of the disciplinary system suitable for sanctioning non-compliance with the measures indicated in the Model (including this Code of Ethics) pursuant to Art. 7, paragraph 4, letter b) of Italian Legislative Decree (D. Lgs.) 231/2001.

### 10.3. ORGANISMO DI VIGILANZA

Each Group company, in accordance with Art. 6, paragraph 1, letter b) of Italian Legislative Decree (D. Lgs.) 231/2001, establishes an internal body to supervise the operation of and compliance with the Code of Ethics and the entire crime prevention system, called the *Organismo di Vigilanza*, whose characteristics are described in the Organisation, Management and Control Model of each of them. This body is independent of the administrative body, distinct from all other bodies and functions of the Group and endowed with autonomous powers of initiative and control also for the purposes of implementing the Code of Ethics.

### 10.4. REPORTING VIOLATIONS

All addressees, internal and external to the Group, are required to report in writing any non-compliance with the Code committed by other addressees to the *Organismo di Vigilanza*, in accordance with the reporting procedures adopted by each Company.

The *Organismo di Vigilanza* undertakes to protect the authors of reports against any retaliation they may face and to keep their identity confidential, unless specifically required by law.

Reports that are manifestly unfounded or in bad faith are subject to the sanctions provided for in the disciplinary system adopted by the Company pursuant to Art. 7, paragraph 4, letter b), of Italian Legislative Decree (D. Lgs.) 231/2001.

Reports may be forwarded to the e-mail boxes of the individual *Organismi di Vigilanza* or through the Whistleblowing channel, the addresses of which are published on the website and in the respective Organisational Models, General Part.

## 11. FINAL REFERRAL RULE

This Code is implemented in coordination with the prescriptions of the Organisation, Management and Control Model with preventive penal purposes adopted by each Group Company.

The Code automatically incorporates all present and future company rules and directives aimed at complying with the laws and regulations in force, with particular reference to the prevention and suppression of corporate offences, constituting a valid legal safeguard for the operations of the Group and its member Companies.

The Code incorporates the Code of Ethics of *Confindustria*.