



**CODE OF ETHICS OF CONDUCT**  
**EX D.Lgs 231/2001**

*TECH POL srl*

*Zona Ind.le PIP loc. Sant'Amico*

*Morro D'Alba(AN)*

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## 1. Introduction

TECHPOL SRL through this Code gives evidence of its ethical and legal responsibility with principles that apply to Employees, Collaborators, Company Management and customers except as otherwise established herein and within the limits set by law or by contracts, also in labor law.

The guiding values of TECHPOL are those of:

- centrality of the person, regardless of their role;
- innovation, understood as a dynamic propensity for change in the search for solutions advanced and effective;
- listening and comparison, because the dialectical relationship and the careful evaluation of considerations, even critical, it is crucial to improve;
- fairness and transparency, which a company cannot ignore;
- customer satisfaction, without which there are no prospects for the company, especially in market;
- motivation of human resources, which are the determining factor for the success of any organization;
- management by objectives, which is the same reason that led us to this work.

In relation to these values and to protect one's position and image, the expectations of owners and the activity of its employees and collaborators, the Company is sensitive to the need for ensure conditions of fairness and transparency in the conduct of business and activities business.

Compliance with this Code is of significant importance to ensure success and success business development.

This official document expresses the set of rights, duties and responsibilities of the Company towards the "stakeholders" (employees, suppliers, customers, etc.). It aims to recommend, promote or prohibit certain behaviors, beyond and regardless of what is required by law.

TECHPOL hopes for the spontaneous sharing, adherence and dissemination of the Code and prescribes it the observance and application by every person who works on behalf of the Company or who comes in contact with the same, constituting the inspiring principle and the foundation of all that is foreseen in the Model adopted pursuant to art. 6 of Legislative Decree 231/01, which TECHPOL undertakes to apply, strengthen and develop continuously.

The consequence is that any non-compliant behavior, even if, by hypothesis, in the intention of those who implement them, aimed at facilitating the Company, are neither permitted nor tolerated and are to be understood as activities committed to the detriment of the Company.

It is divided into 5 points:

- general provisions, which define the recipients of the Code, the corporate obligations and its personal, the value to be attributed to the Code towards third parties, the contractual value of the Code;
- corporate ethical principles, which define the reference values in the activities;

- rules and standards of behavior, which define guidelines that must guide, on based on ethical principles and beyond the observance of the laws, the behavior of all staff, with particular with regard to those who have managerial and control responsibilities;
- work ethic and protection and enhancement of collaborators, in which a focus is made on collaborators as a fundamental resource for business management;
- implementation and control procedures, which describe the mechanisms and bodies set up for implement, monitor and disseminate compliance with and compliance with the Code and ensure its constant update;

The Code is brought to the attention of all employees, collaborators and customers and, in consideration of the volume of its contents, can be consulted on the website [www.tech-pol.com](http://www.tech-pol.com), from which it is freely available downloadable.

Compliance with this Code is an integral part of the contractual obligations of the employees of TECHPOL, also pursuant to and for the purposes of art. 2104 CC1 and its violation can constitute a breach of contract and / or a disciplinary offense and, where appropriate, may result in the compensation for any damage caused to TECHPOL from such violation, in accordance with the current legislation and collective agreements applicable from time to time.

The Code is subject to periodic review by the Board of Directors and by of the Supervisory Body set up at TECHPOL pursuant to Legislative Decree no. 231/2001

The auditing activity will take into account the contributions received from the "recipients" of this Code, as well as regulatory changes and the most established national and international practices, as well as of the experience acquired in applying the Code itself.

## 2. General principles

In carrying out its business, TECHPOL is inspired by compliance with the law and regulations of the legal system and so all employees must do the same in addition to following the policy for which violations of the law must be avoided in all circumstances.

TECHPOL conducts its business in compliance with Community, national and international organizations, rejecting corruption and any illegal practice.

No conduct contrary to current legislation, this Code of Ethics or regulations internal, put in place by the corporate governance bodies, by the company management and - in general - by all employees and collaborators in the execution of the tasks or tasks entrusted, too if motivated by the pursuit of an interest of the Company, it can be considered justified. His occurrence involves the adoption of sanctions against those responsible.

The Company considers the performance of the services by the employees and collaborators according to diligence, competence, professionalism and efficiency also in order to provide customers and subjects with whom it has relationships deriving from carrying out its business, high quality performance such as to ensure the regularity and continuity of the service.

TECHPOL considers the impartiality of treatment a fundamental value in the context of each both internal and external relationship and considers the individual, his values and rights, values to be protected.

The Company considers its image and reputation values which, as a heritage common, must be protected and developed also through full dissemination, sharing and observance of the ethical and behavioral principles contained in this Code.

All those who act, operate and collaborate in any capacity with TECHPOL Srl have a duty to maintain and have its collaborators and interlocutors behave in compliance with general principles of absolute honesty, loyalty, good faith, fairness and diligence, as well as specific ones obligations that may derive from deontology and, in any case, from those principles deemed due by virtue the context and purpose of its mission.

In no way can the conviction of acting in the interest or for the benefit of the Company justify the adoption of conduct in contrast with the principles indicated in this Code and in the Model.

The Company does not establish or continue business relationships with anyone who expressly refuses to respect the principles of the Code.

TECHPOL is committed to all those involved in the application of this Code to:

- ensure its timely dissemination, both by making it available to all, and by implementing appropriate measures training programs;
- ensure that all updates and changes are promptly notified of all the Recipients of the Code;
- prepare appropriate support tools to provide clarification on the interpretation and implementation of the provisions of the Code;
- adopt adequate procedures for the reporting, investigation and treatment of any violations;
- ensure that those who report violations of the Code are not subject to any form retaliation;
- periodically verify compliance with and observance of the Code;

The Code forms part integral to the employment relationship and expresses the essential content of the fiduciary bond between the Company and Collaborators.

All directors, employees and collaborators undertake to:

- act and behave in line with what is indicated in the Code;
- report all violations of the Code as soon as they become aware of them;
- cooperate in defining and respecting the internal procedures set up for implementation to the Code;
- consult your manager, or the relevant bodies, in relation to the parts of the Code on which need interpretation or guidance.

### **3. Recipients of the Code**

The rules of the Code of Ethics apply without exception to the directors and employees of TECHPOL and to all subjects who, directly or indirectly, permanently or temporarily, they will establish, for any reason, relationships and collaborative relationships, cooperating in carrying out them of its activity and the pursuit of its purposes.

The principles of the Code of Ethics must inspire the members of the Board of Directors in any decision or action relating to business management; likewise the managers, in giving concrete implementation to the management activity, they must be inspired by the same principles, also in order to represent a reference model for employees and collaborators.

### **4. Obligations of the recipients**

All actions, operations and negotiations and, in general, the conduct put in place by "Recipients" of this Code in carrying out their work must be based on the principles of honesty, fairness, integrity, transparency, legitimacy, clarity and mutual respect. The "Recipients" undertake to actively collaborate in the verification activities - internal and external - according to current regulations and internal procedures.

All activities must be carried out with commitment and professional rigor. Each "recipient" must provide professional contributions appropriate to the responsibilities assigned and must act in such a way as to protect the prestige and image of the company.

All coordinators and managers must earn respect by adopting personal behavior exemplary, demonstrating efficiency, loyalty and competence, promoting it through his own position within the company and with training by setting one's goals clearly e ambitious and leading by example.

All managers must prove themselves available to their collaborators who wish to bring corporate rules concerns to their attention, address questions or discuss professional or personal matters.

TECHPOL employees, as well as fulfilling the general duties of loyalty, correctness and execution of the employment contract in good faith, must refrain from carrying out competing activities with those of the Company, respect the company rules and abide by the precepts of the Code.

The "recipients" must avoid situations and / or activities that may lead to conflicts of interest with those of the Company or that could interfere with their ability to make decisions impartial, in safeguarding the best interests of the same.

Employees and all those who have collaborative relationships with TECHPOL, are required to adapt their behavior to the provisions and principles of the Code of Ethics, by not assuming initiatives in contrast with the Code itself.

### **5. Validity in the code towards third parties**

In relation to third parties, all company personnel, by reason of the responsibilities assigned, will provide:

- provide adequate information on the commitments and obligations imposed by the Code;
- demand compliance with the obligations that directly concern their business;
- implement the appropriate internal initiatives and, if within its competence, external in case of failure by third parties to comply with the obligation to comply with the rules of the Code.

### **6. Contractual value of the code of ethics**

Compliance with the rules and provisions contained in the Code of Ethics is an integral part and essential of the contractual obligations deriving from subordinate employment relationships, for employees and contractual regulations, for non-subordinate collaborators.

The violation of the aforementioned rules will constitute a breach of the obligations deriving from the relationship work or collaboration, with all legal or contractual consequences.

### **7. Ethical principles**

In relations with third parties, TECHPOL is inspired by principles of loyalty, correctness, transparency and efficiency. Company employees and external collaborators must follow correct behavior in business of interest to the Company, regardless of market competitiveness and importance of the deal treated.

All practices of corruption, fraud, illegitimate favors, collusive behavior, solicitations (direct and/or through third parties) for personal and career advantages for oneself or for others.

### **8. Strategic value of human resources**

Human resources are the great asset of TECHPOL. They constitute its strength, effectiveness, intelligence, reputation and a guarantee for the future.

Only with their full involvement at every level, in teamwork, in sharing objectives, as well as in their protection and promotion, the Company can fulfill its mission.



## **9. The quality of the products supplied and the services provided**

TECHPOL directs its business to the satisfaction and protection of its customers, guaranteeing that the products supplied and the services provided always match the best existing innovations and ensure the highest degree of effectiveness and quality.

## **10. Profitability**

Profitability is a necessary and essential value to guarantee self-sufficiency, development and growth. This represents not only an indicator of the quality of the work carried out and an index of customer satisfaction, but also the measure of the company's ability to operate according to the principles of efficiency and effectiveness.

In any case, the value of profitability must in no way induce the management, the staff employee, external collaborators and commercial partners to the violation of the ethical principles contained in the Code to achieve positive economic results.

## **11. Integrity**

Integrity is an important element of the company's assets and is a strong guarantee of commitment civil society towards all the people who work in it, all suppliers, all its Customers and all its stakeholders in general.

Respect for this principle is achieved by applying the law and respecting the rules of moral integrity in every sector of activity and in every circumstance.

TECHPOL does not tolerate violations of this principle and discourages all practices of corruption.

Directors and all company personnel in the exercise of their functions - at different levels of responsibility - they must not make decisions or carry out activities that conflict with interests of the Company or incompatible with the duties of the office.

Situations in conflict with this rule must be immediately communicated to your own any managers or the Supervisory Body.

In particular, management, employees and company collaborators must avoid conflicts of interest between any personal and family economic activities and the duties they perform within the structure to which they belong.

## **12. Impartiality**

In relations with its stakeholders, the Company avoids any discrimination based on age, sex, sexuality, health, race, nationality, political opinions and religious beliefs, also does not take into account of recommendations or suggestions of external or internal origin and ensures impartiality and fairness in compliance with the legal and contractual rules and the principles enshrined in this Code.

Any attempt to violate this rule must be communicated to the company structures competent who, where necessary, make the appropriate communications to the Management company or to the Supervisory Body.

### **13. Confidentiality and privacy protection**

Confidentiality is one of the fundamental values to be respected in concrete business operations, as it contributes to the reputation of the company itself.

All personnel, of all levels and levels, and external collaborators are required to comply with this principle even after the termination of the employment relationship. In particular the management, the staff employee and external collaborators must guarantee the confidentiality of information, documents and data which they became aware of during their work and which are considered as belonging to TECHPOL and, as such, cannot be used, communicated or disseminated without specific authorization.

The obligation of confidentiality on the confidential information acquired is also imposed on subjects with to which the Company entertains contractual or other relationships, through specific clauses contractual or by requesting the signing of confidentiality agreements.

Without prejudice to the prohibition to disclose information relating to the organization and production methods of the company or to use it in such a way as to be prejudicial to it, each "recipient" must:

- acquire and process only the data necessary for the performance of its functions;
- acquire and process the data only within specific procedures;
- keep the data themselves so that it is prevented that other unauthorized users take it knowledge;
- communicate the data in the context of pre-established procedures and / or with the explicit authorization of the competent functions and in any case after verifying its disclosure;
- associate the data in such a way that any person authorized to have access to it can easily draw a picture that is as precise, exhaustive and truthful as possible.

TECHPOL undertakes to protect the information relating to its employees and third parties generated or acquired internally and in business relationships, and to avoid any misuse of this information.

### **14. Individual responsibility**

The quality and strength of the company are the result of the action of all its staff.

Everyone is responsible for the actions taken in carrying out their work.

In addition, for those who perform managerial functions there is also the responsibility to supervise the activity carried out by personnel subject to their management and control.

### **15. Transparency of accounting**

TECHPOL is aware of the importance of the transparency, accuracy and completeness of the accounting information and endeavors to have a reliable administrative-accounting system in the correctly represent the management facts and in providing the tools to identify, prevent and manage, as far as possible, risks of a financial and operational nature, as well as of fraud to the detriment of the Company.

The accounting records and the resulting documents must:

- be based on accurate, comprehensive and verifiable information;
- reflect the nature of the transaction to which they refer in compliance with external constraints (rules of law and accounting principles), as well as policies, plans, regulations and internal procedures;
- be accompanied by the relevant supporting documentation necessary to allow analysis and objective checks.

In the activity of accounting for the facts relating to the management of the Company, the employees and collaborators are required to scrupulously comply with current legislation and internal procedures in so that each operation is not only correctly recorded but also authorized, verifiable and legitimate.

The accounting records must make it possible to:

- produce accurate and timely economic, equity and financial statements;
- provide the tools to identify, prevent and manage, as far as possible, fraud and risks of a financial and operational nature;
- carry out controls that reasonably allow to guarantee the safeguarding of the value of assets and loss protection.

All employees and collaborators are required to operate so that the management facts are represented correctly and promptly, so that the administrative accounting system can achieve all the purposes described above.

Adequate supporting documentation of the activity is kept in the records for each operation carried out, in order to allow:

- easy accounting entry;
- identification of the different levels of responsibility, i.e. who authorizes, carries out, records, verify the operation itself;
- accurate reconstruction of the transaction, also to reduce the probability of errors interpretative.

Each record must reflect exactly what is shown in the supporting documentation.

It is the duty of each "recipient" to ensure that the documentation is easily traceable and ordered according to logical criteria. Employees and collaborators are required to act transparently towards the board of statutory auditors and the body in charge of the audit, in addition to providing them with the utmost cooperation in the carrying out the respective verification and control activities.

If they become aware of omissions, falsifications, negligence in accounting or of the documentation on which the accounting records are based, are required to report the facts to their own superior or the competent function.

## **16. Rules and standards of ethical behavior in the conduct of company activities**

TECHPOL structures and develops its business activity by applying the identified ethical principles in this Code and requesting its "recipients" to adapt their behavior to this setting under any circumstances.

## **17. Relationship with external collaborators**

The Company proceeds with the identification and selection of collaborators and consultants with absolute impartiality, autonomy and independence of judgment.

External collaborators (consultants, professional firms, intermediaries, etc.) are required to observe the principles contained in this Code.

The directors and all employees of TECHPOL, in relation to their duties, must:

- carefully evaluate the opportunity to use external collaborators;
- select only counterparties with adequate professional qualification and reputation;
- obtain from the external collaborator the assurance of constant satisfaction of more convenient relationship between level of performance, quality, cost and time;
- operate within the laws and regulations in force;
- request external collaborators to abide by the principles of this Code and include in the contract the express obligation to abide by it;
- promptly report to their superior or to any competent function behavior of the external collaborator who appears contrary to the ethical principles of the Code.

Behavior contrary to the principles expressed in the Code of Ethics can be considered serious non-fulfillment of the duties of correctness and good faith in the execution of the contract, reason for injury of the fiduciary relationship and just cause for termination of contractual relationships.

## **18. Relations with partners and third parties**

TECHPOL may undertake business initiatives jointly with other subjects within the limits of the provisions of the Articles of Association.

It is TECHPOL's goal to conduct business exclusively with clients, consultants and counterparties reputable commercial persons who are engaged in legal business activities and whose skills financial assets are of lawful origin.

TECHPOL observes export control laws and regulations, imports and customs matters.

In developing these initiatives, all directors, employees and collaborators must:

- establish relationships with partners or other shareholders who are inspired by comparable ethical principles or however compatible with those of TECHPOL;
- ensure that no partner is guaranteed disproportionate treatment favorable or unfavorable with respect to his contribution;
- ensure the transparency of the agreements and avoid the signing of pacts or secret agreements contrary to current legislation;
- maintain frank, open and collaborative relationships with partners;
- promptly report to their superior or to any competent function conduct of a partner or shareholder that appears to be contrary to the ethical principles of the Code.

### **19. Relations with Customers**

In carrying out its business and managing customer relations, the Company abides by scrupulously with the law, the principles of this Code, the existing contracts and the internal procedures.

In particular, it is mandatory to:

- supply, with efficiency and courtesy, within the limits of the contractual provisions, quality products;
- provide accurate, timely and comprehensive information about the services to the customer can make informed decisions.

### **20. Relations with suppliers**

In relations for the supply of goods and the provision of services, the Company operates in compliance with the law, the principles of this Code, existing contracts and company procedures. Employees in charge of relations with suppliers and service providers must proceed with the selection of themselves and to the management of the related relationships according to criteria of impartiality and fairness, avoiding situations of conflict of interest, even potential, with the same, reporting to the relevant functions the existence or occurrence of such situations.

In relations of procurement and, in general, of supply of goods and / or services, the "recipients" of the rules of this Code are required to:

- observe the internal procedures for the selection and management of relations with suppliers;
- do not preclude any supplier company in possession of the required requisites from the possibility of compete to win a supply, adopting evaluation criteria in the selection objective, according to declared and transparent methods;
- maintain an open dialogue with suppliers, in line with good commercial practices.

TECHPOL expects its suppliers to share TECHPOL values and comply with all laws applicable, as well as acting in accordance with the principles similarly adopted by TECHPOL assuming the relative responsibilities towards the subjects involved and the environment as per title exemplary prohibiting corruption, respecting the fundamental human rights of its workers, observing the laws on the prohibition of child labor, assuming the responsibility and safety of its collaborators and ensure environmental protection in compliance with regulations and standards applicable internationally.

## **21. Relations with competitors**

The Company recognizes the fundamental importance of a competitive market and strictly respects the provisions of the law on competition and refrains from engaging in conduct deceptive, collusive and, more generally, any behavior that can integrate a form of unfair competition.

## **22. Relations with supervisory and control subjects**

The Company imprints its relations with the subjects in charge of supervision and control to the utmost collaboration in full respect of their role, undertaking to promptly execute their prescriptions.

The Company undertakes to provide all the information requested by the persons in charge of supervision and control, in a complete, correct, adequate and timely manner. To this end, the Company prepares and implements the appropriate internal communication and collection, processing and transmission procedures of the information requested by these subjects.

## **23. Work ethics, protection and enhancement of employees**

The Company ensures the widest dissemination of the Code of Ethics among employees and collaborators. It proceeds with the identification and selection of employees with absolute impartiality, autonomy and independence of judgment, in full compliance with current legislation and internal procedures.

TECHPOL requires its employees to know and observe the provisions of the Code of Ethics and which, compatibly with individual possibilities, promote their knowledge among the newly hired employees, as well as from third parties involved in the application of the same with whom come into contact for reasons of their office.

Employees are obliged to:

- refrain from conduct contrary to the rules of the Code of Ethics and demand compliance with it;
- contact their superiors or the functions appointed to do so in case of need for clarification on the methods of application of the same;
- promptly report any direct news to superiors or to the Supervisory Body detection or reported by others, regarding possible violations of the rules of the Code of Ethics as well as any request to violate the rules that has been addressed to them;
- collaborate in the verification of possible violations with the structures assigned to this.

Any unfounded report made in bad faith in order to cause damage to colleagues and / or collaborators will be considered an infringement and disciplined.

The company pays the utmost and constant attention to the enhancement of human resources. To that end considers the merit criterion, professional competence, honesty and correctness of conduct privileged grounds for the adoption of any decision concerning career and any other aspect relating to the employee.

Employees are required to carry out a conduct that is constantly respectful of the rights and of the personalities of colleagues, collaborators and third parties, regardless of their position hierarchical within the Company.

TECHPOL recognizes and respects the right of employees to participate in investments, business or ad activities of another kind outside of that carried out in the interest of the Company itself, provided that it is activities permitted by law and / or by the sector national collective bargaining agreement, as well as compatible with the obligations undertaken in quality of employees.

#### **24. Protection of employee dignity and integrity**

TECHPOL recognizes that human resources are an indispensable element for existence, the development and success of the company and that the motivation and professionalism of its staff they are an essential factor in maintaining competitiveness.

The company is therefore committed to developing skills and stimulating skills and potential of its employees so that they find full realization in achieving the objectives.

The Company offers equal employment opportunities to all employees based on specific qualifications professional and performance capabilities, without any discrimination as the function competent selects, hires and manages employees based on criteria of competence and merit, without any consideration of race, religious belief, sex, age, ancestry, respecting the laws and regulations in force.

Employees who believe they have suffered discrimination can report the incident to the function of Personnel and / or their manager who will proceed to verify the actual violation of the Code Ethical.

The Company reaffirms its commitment to preserve the moral and physical integrity of its employees, collaborators and consultants.

The competent functions ensure that the working environment is not only adequate from the point of view of personal safety and health, free from bias and that each individual is treated with respect, without any intimidation and respecting his moral personality, avoiding illicit acts conditioning and undue inconvenience.

#### **25. Occupational health and safety**

TECHPOL considers the environment and nature fundamental values and heritage of all, to be protected and by stick up for. To this end, the Company, as part of its activities, is committed to contributing to development and well-being of the communities in which it operates, pursuing the objective of guaranteeing safety and the health of employees, external collaborators, customers and to reduce the environmental impact.

The Company undertakes to manage its activities in full compliance with current legislation on the subject of environment, health, safety. Operational management must refer to advanced criteria of environmental protection and energy efficiency by pursuing the improvement of the conditions of occupational health and safety.

Research and technological innovation must be dedicated in particular to the promotion of products and processes increasingly compatible with the environment and characterized by an ever greater attention to the safety and health of operators.

The Company is committed to spreading a culture of safety by developing the awareness of risks and promoting responsible behavior on the part of employees and collaborators who, as part of their



duties and functions, they participate in the risk prevention process, of protection of the environment and protection of health and safety towards oneself, of colleagues and third parties.

The general measures for the protection of the health and safety of workers that TECHPOL takes undertakes to adopt are:

- assessment of health and safety risks;
- minimization of risks and limitation to a minimum of the number of workers exposed to risk;
- prevention planning;
- respect for the principles of ergonomics in the workplace;
- priority of collective protection measures over individual protection measures;
- limited use of chemical, physical and biological agents in the workplace;
- hygiene measures and health control of workers according to specific risks;
- emergency measures to be implemented in the event of first aid, fire fighting, di evacuation of workers and serious and immediate danger;
- use of warning and safety signs;
- regular maintenance of environments, equipment, machines and systems;
- information, training, consultation and participation of workers or theirs representatives, on matters relating to safety and health in the workplace;
- adequate instructions to workers.

## **26. Situation of conflict of interest, fair competition, antitrust and anti-corruption**

All employees must ensure that every business decision is made in the best interests corporate; they must therefore avoid any situation of conflict of interest between activities personal or family economic and duties held in the Company.

If a manager, collaborator or employee finds himself in a situation that, too potentially, may constitute or lead to a conflict of interest is required to report it for promptly registered with his / her superior so that his / her actual presence is assessed and defined any intervention; activities cannot be conducted or carried out in favor of a company competitor of TECHPOL or engage in any competitive activity including collateral.

In the case of paid collateral activities, the subject must inform the manager in advance or in top line and obtain written permission. Occasional activities or sporadic engagements are not considered collateral activities. The authorization will be refused if the applicant has relations with the company / third party / or during the performance of their functions for TECHPOL.

Employees and collaborators are required to comply with the legislation on fair competition. Between behaviors that may constitute a violation of antitrust legislation:

- Discuss prices, production, capacity, sales, offers, profits, margins with competitors profit, costs, distribution methods or any other parameter that may determine or influence the competitive conduct of the Company in order to induce the competitor to align to such conduct;
- To exert some influence on the resale prices charged to customers or to attempt to impose restrictions on the export or import of goods supplied by TECHPOL.

Finally, avoid obtaining information on competitors by resorting to industrial espionage, bribery, theft or electronic eavesdropping, or knowingly disclosing false information about a competitor or its products / services.



TECHPOL competes fairly in the market with the quality and price of its products, not offering undue advantages to third parties. Any offer, promise, grant or donation must be carried out in accordance with applicable laws and TECHPOL's policy and must not create the impression of bad faith or incorrectness. This means that none can be done offer, promise, concession or gift if it can reasonably be construed as a attempt to unduly influence an employee or as an act of bribery against of a commercial counterparty for the granting of a business advantage to TECHPOL.

### **27. Harassment in the workplace**

TECHPOL requires that no harassment is given in internal and external business relationships, meaning as such:

- the creation of an intimidating, hostile or isolating work environment towards individuals or groups of workers;
- unjustified interference with the performance of other people's work;
- the obstacle to the individual job prospects of others for mere reasons of personal competitiveness.

The Company prevents, as far as possible, and in any case persecutes mobbing and personal harassment of all kinds and therefore also sexual.

### **28. Abuse of alcohol or drugs**

The Company requires that each "recipient" personally contribute to maintaining the environment of work respectful of the sensitivity of others. In the course of work and in the workplace it is prohibited:

- serving under the effects of alcohol, drug or drug abuse substances of similar effect;
- consume or transfer drugs for any reason during the performance working.

The Company undertakes to favor the social actions envisaged on the matter by the legislation in force.

### **29. Smoking**

In compliance with current legislation, it is forbidden to smoke in the workplace and, as established by the regulations in force, the Company identifies the subjects responsible for the control and request of application of administrative sanctions.

### **30. Use of company assets**

It is the duty of each employee to safeguard company assets with care and respect, avoiding improper use of assets available to him for office reasons.

The different use of the assets and resources owned by the company and supplied is not allowed to staff and collaborators due to the duties of their offices.

In no case is it allowed to collect or transmit information that promotes or incites racial hatred, exaltation of violence or other criminal acts, or which contain material considered offensive from a sexual point of view in the context of the reference cultural environment.

Employees and collaborators are not allowed without the prior authorization of their own top line manager, composing archives, databases, video or audio recordings, or reproductions using TECHPOL equipment or facilities, except for purposes directly connected to the business activity.

### **31. Anti-money laundering**

TECHPOL and all its collaborators must never carry out or be involved in activities such as involve money laundering (i.e. acceptance or treatment) of proceeds from criminal activities in any form or way.

The Company and all its collaborators must check the information available in advance (including financial information) on commercial counterparties, suppliers and third parties in general, in order to ascertain their respectability and the legitimacy of their activity before establishing with these relationships business. They must also comply with all the provisions regarding accounting and registration and financial reporting applicable to cash flows and payments associated with other transactions and contracts.

TECHPOL must always comply with the application of anti-money laundering regulations in any competent jurisdiction.

### **32. Internal controls**

The "recipients" must be aware of the existence of control procedures and aware of the contribution that these make to the achievement of corporate objectives and efficiency. For checks internal means all the tools necessary or useful to direct, manage and verify the activities of the Company with the aim of ensuring compliance with laws and company procedures, protecting company assets, efficiently manage business and provide accurate accounting and financial data e complete.

The responsibility for creating an effective internal control system is shared at every operational level. Consequently, all the "recipients", within the scope of the functions performed, are responsible for the definition, implementation and correct functioning of the controls relating to the operating areas entrusted to them. As part of their competences, the function managers are required to participate in the company control system and to involve their collaborators.

Each operation and transaction must be correctly recorded, authorized, verifiable, legitimate, consistent and congruous.

### **33. Methods of implementation, control and sanctions**

#### ***33.1 The Supervisory Body***

The Code of Ethics represents a non-derogable general principle of the Organizational Model, management and control adopted by the Company. The body appointed to supervise the correct and timely application of the Model as well as on compliance with the principles of this Code of Ethics is therefore the Supervisory Body, which coordinates properly with the Company's bodies and functions competent.

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

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

### ***33.2 Compliance with the code and reports***

The corporate bodies and their members, employees, consultants, collaborators and third parties who act on behalf of the Company are required to promptly report to the Supervisory Body:

- any violations or inductions to violate laws or regulations, prescriptions of this Code of Ethics, of internal procedures and of the components of the Model;
- any irregularity or negligence in keeping the accounts, in the conservation of the relative documentation, in the fulfillment of accounting or management reporting obligations internal;
- any requests for clarification on the evaluation of the correctness of one's own behavior or others, as well as possible shortcomings of this Code of Ethics or proposed amendments and / or integration of the Code of Ethics itself

The corporate bodies and their members, employees, consultants, collaborators and third parties who act on behalf of the Company are required to promptly report to the Supervisory Body any information relating to the commission of crimes, unlawful acts, or otherwise contrary behavior the rules of conduct provided for by this Code of Ethics, by the Organization and Management Model and Control adopted by the Company and by further internal regulations that are relevant for the purposes of compliance with Legislative Decree 231/2001.

### ***33.3 Whistleblowing***

TECHPOL Srl promotes the prevention and verification of any illegal conduct or, in any case, contrary to the Code of Ethics and Conduct. The Company encourages Recipients to report promptly to the Supervisory Body any illegal conduct or, in any case, contrary to the Code ethics and behavior, which they become aware of by reason of their relationships with Society. Outside the cases of liability by way of slander or defamation, or for the same title pursuant to Article 2043 of the Civil Code, the Recipient who reports in good faith to the Body unlawful conduct or, in any case, contrary to the Code of Ethics and Conduct, of which it is who became aware of his relations with the Company, cannot be sanctioned.

Towards Collaborators who make reports within the whistleblowing system introduced by the Company, no form of retaliation or measure is permitted or tolerated discriminatory, direct or indirect, affecting working conditions for related reasons directly or indirectly to the complaint.

To this end, discriminatory measures are understood to be unjustified disciplinary actions, harassment on workplace and any other form of retaliation that results in intolerable working conditions.

Any form of abuse of the whistleblowing system, carried out through reports, is also prohibited manifestly opportunistic and / or carried out for the sole purpose of damaging the accused or others subjects, as well as through improper use or intentional exploitation of the institution.

The Company, in order to guarantee the effectiveness of the whistleblowing system, has regulated with specific provisions for reporting by employees, directors and members of the bodies companies as well as by third parties, all of whom have been made aware of the existence of specific channels

of communication that allow them to submit any reports based on factual elements precise and consistent, with the guarantee, also through IT methods, of confidentiality the identity of the reporting party.

On this point, in particular, the Company has regulated the matter, in the specific Protocol 03 - "*Reports, whistleblower protection and periodic information flows to the Supervisory Body*" – in which are the methods of communication and management of the reports to them of the SB, as well as the measures envisaged to guarantee the confidentiality of the whistleblower.

In compliance with these internal regulations, the Company, in order to facilitate reporting to the Supervisory Body from part of the subjects who become aware of violations, even potential, of the Model Organization, Management and Control adopted by the Company, the Code of Ethics and further

internal legislation that is relevant for the purposes of compliance with Legislative Decree 231/2001, has activated the following communication channels dedicated to the Supervisory Body:

- the e-mail address: [odv@tech-pol.com](mailto:odv@tech-pol.com)

- the PO box: OdV TECHPOL Srl, at TECHPOL Srl - Industrial area pip snc - Fraz. Sant'Amico - Morro d'Alba - 60030 (AN), to which address send the report by inserting it in a sealed envelope with the words "CONFIDENTIAL" / "PERSONAL".

### **33.4 Disciplinary system**

Compliance with the provisions of this code of ethics by employees and all those who exercising the management of the Company must be considered an essential part of the contractual obligations also pursuant to art. 2104 cc

The violation therefore constitutes a breach of the primary obligations of the employment relationship as well as a disciplinary offense with all legal consequences.

Failure to comply with the principles contained in this Code may result in the application of measures sanctions in compliance with the laws in force, the applicable CCNL and the System disciplinary which is an integral part of the organizational model adopted by the Company pursuant to of the Legislative Decree n. 231 of 2001 and subsequent amendments.

Infringements by third parties will be sanctioned according to the criteria indicated in the specifications contractual clauses provided for in contracts with consultants, suppliers of goods and services, including professional ones which expressly bind the parties to respect the principles and rules contained herein Code and that in case of violation they give the Company the right to withdraw from the contract or to ask for its resolution.

### **33. Adoption of the Code of Ethics and revision**

This Code of Ethics is adopted by the TECHPOL Board of Directors, which will do so also, having heard the opinion of the Supervisory Body, to review and periodically update it.