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**Techniconsult Firenze S.r.l. Benefit Company**  
**Tecma S.r.l. Benefit Company**

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**CODE OF ETHICS**  
**TECHNICONCONSULT GROUP**

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This Code of Ethics has been drawn up and approved by the our Board of Directors to ensure that the fundamental ethical values of Techniconsult Firenze S.r.l. Benefit Company and Tecma S.r.l. Benefit Company are clearly defined and constitute the basic element of the corporate culture, as well as the standard of all the Company's collaborators in the conduct of business and, in general, of their activities.

The directors, executives, employees and in general all persons collaborating with Techniconsult and Tecma, including external subjects (professionals, consultants, suppliers, etc.), hereinafter "Addressees", are aware of their responsibilities towards the Company's stakeholders and are required to comply with the ethical principles contained in this document.

## 1) General Principles

The conduct of the Addressees, at all levels, is marked by the principles of Professionalism and Trust, Legality and Honesty, Competition, Impartiality, Fairness and Transparency.

The provisions contained herein are of primary and absolute value; in no case does the conviction that one is acting to the benefit of the Company justify conduct contrary to the principles set out below.

### Legality and Honesty

Techniconsult and Tecma are committed to conducting their business in full compliance with current regulations, this Code of Ethics and internal procedures, ensuring that the decisions taken are not in any way traceable, even potentially, to personal interests or in conflict with the fiduciary duties that underlie the corporate role held by each.

This commitment is aimed at:

- to ensure maximum circulation of the Code of Ethics among employees and collaborators;
- to provide any possible clarification on the interpretation and implementation of the Code of Ethics rules and in particular on its application in company procedures;
- to carry out checks on any reports of violations of the Code of Ethics and, in the event of an ascertained violation, to adopt appropriate sanctioning measures;
- to adopt all security measures required by technological developments and to ensure that the physical integrity and moral personality of employees is guaranteed.

The Companies promote a culture of legality: no unlawful conduct, even if carried out in the interest or to the advantage of Techniconsult or Tecma, may be considered in line with the policies promoted.

Relations with stakeholders are characterised by fairness and honesty.

The provisions contained herein are of primary and absolute value; in no case does the belief that one is acting for the benefit of Techniconsult and Tecma justify conduct in conflict with the principles set out below.

## **Fundamental Human Rights**

Techniconsult Firenze S.r.l. and Tecma S.r.l. shall ensure the respect of fundamental Human Rights (e.g. working hours, fair wages, minimum age for entry into employment, workplace conditions, accessibility to disabled persons, maternity protection, prohibition of harassment, forced/forced/forced labour) of the Company's people and of the human resources of Suppliers.

The companies reject the use of child labour, as defined by the legislation in force in the country of execution of the activities, and, in any case, not less than the minimum age established by ILO Convention No. 138.

## **Rights regarding diversity, equality, non-discrimination and equal opportunities**

The Companies respect the Human Rights of every individual and do not discriminate against anyone on the basis of religion, age, gender, sexual orientation or gender identity, political opinion, social status and origin, race or ethnicity, colour, language, physical or mental disability, pregnancy, maternity or paternity status, including adoptive, and any other form of diversity.

Companies are committed to treating people fairly and honestly, valuing the principle of Equal Opportunities in all aspects of the employment relationship (recruitment, training, allocation of benefits, career advancement, disciplinary proceedings, termination of employment, retirement), without distinction.

The Companies pursue the objective of creating an inclusive working environment that welcomes differences and enhances them in the belief that diversity is an asset for the development of Techniconsult and Tecma.

Companies ensure that, in the application of hierarchical rules in relations with workers, no conduct detrimental to the worker's dignity and professionalism is manifested.

## **Commitment against harassment and bullying in the workplace**

The companies are committed to ensuring a correct and professional working environment for all its workers, whatever the type of relationship established and the role they hold.

The Company rejects and condemns harassment in all its forms, and considers it all the more serious when it is used, implicitly or explicitly, to exert pressure in the case of the recruitment of an employee, or in the case of decisions concerning his/her professional future, or when it has the purpose or effect of unreasonably interfering with the employee's professional performance or creating an intimidating, hostile, humiliating or offensive working environment.

## **Health and safety of workers**

The Companies guarantee protection and safety in the workplace for their own personnel and for third parties, committing themselves to the observance of the legislation on safety in the workplace and to the promotion of safety in all the places that constitute the work environment. Techniconsult and Tecma pursue the objective of minimising accidents and occupational diseases for the Company's personnel and the human resources of Suppliers.

The companies are committed to ensuring high standards of health and safety at work, promoting a culture of safety through the adoption of responsible behaviour and awareness of operational risks by all employees and collaborators.

Techniconsult and Tecma ensure the creation and management of workplaces and environments suitable from the point of view of the health and safety of employees. Workers must contribute to safeguarding their own and others' safety by complying with the regulations and standards provided for in this area and promptly reporting to their superior any situation that endangers their own safety or that of third parties.

### **Respect for the environment**

The companies are committed to the objectives of sustainable development. Its approach in managing environmental issues is aimed at gradually reducing the direct and indirect impacts generated on the environment and climate.

The companies are committed to spreading and consolidating a strong environmental culture and awareness, always operating in compliance with the laws in force and applying the best available technologies, aware of the impact that their activities generate both directly and indirectly on the environment and the climate.

The Company considers environmental impacts as a relevant area and consequently aims to reduce the effects on the environment generated by the consumption of resources, waste generation and other activities, with the aim of creating, providing and maintaining a healthy environment, extending to the broader concept of preserving the environment for future generations.

### **Social Responsibility**

The company prioritises its social function and operates with consideration for the needs of the community within which it does business, contributing to its economic, social and environmental development.

### **Fair competition**

Competition with other companies, in the same sector in which Techniconsult and Tecma operate, must be constantly inspired by the principles of fairness, fair competition and transparency. The Addressees undertake to refrain from conduct that does not comply with Community and national laws on competition and, in general, from vexatious conduct that encourages unlawful agreements that may integrate forms of unfair competition.

### **Freedom of association and collective bargaining**

The companies guarantee freedom of association and the effective recognition of the right to collective bargaining, sharing with the trade unions a system of industrial relations based on constant and constructive confrontation.

### **Conflicts of interest**

In the exclusive interest of the companies, staff and collaborators, including external collaborators, must ensure neutral and impartial decisions.

Therefore, all staff and collaborators must refrain from participating in activities in which a conflict of interest, even if only potential, may arise.

Conflict of interest shall mean any situation in which the person possesses, in a private capacity, (by "private interests" we mean the personal or professional interests of a collaborator), interests that could influence or appear to influence the way in which he or she performs the functions and responsibilities entrusted to him or her by Techniconsult and Tecma, conditioning the ability to operate in the total interest of the Companies.

This is the case, for example, of an employee who finds himself in a situation where he might make a decision, not so much according to the interests of and Company, but of his own private interests, those of a relative or friend.

If you find yourself in a conflict of interest situation, you must:

- refrain from participating in assigned tasks and assignments and inform their direct superior thereof;
- obtain a waiver from their supervisor, who will contact the relevant councillor to allow them to continue the activity.

In case of doubt, it is prudent to ensure that you are not in a conflict of interest situation, for example:

- if you have, or someone you know has, an interest in a company or organisation that is a customer, competitor or supplier of the Company;
- if you exercise a professional activity outside the Company;
- if one holds responsibilities in public client associations or bodies.

For the purposes of the detection and subsequent management of potential conflicts of interest, an annual questionnaire may be required.

### **Protection of confidentiality and privacy**

Companies ensure the confidentiality of the information in their possession, comply with data protection regulations and refrain from seeking confidential data through illegal means.

The companies are committed to adopting effective IT security policies to ensure the protection of systems and information from potential attacks, as well as guaranteeing maximum continuity of the services provided.

It is forbidden for all employees and collaborators to engage in any unlawful data processing and computer crime.

Employees, collaborators and anyone who has relations with the Company must safeguard, according to the principle of confidentiality, the protection of the entity's technical, financial, legal and administrative know-how and, more generally, any information obtained in relation to the tasks and assignments performed. The Companies, moreover, guarantee that the information and data acquired and managed by personnel and collaborators in the course of their work and, if necessary, entered in special databases, are used within the limits established by company procedures and in compliance with the regulations set out in Legislative Decree 196/2003 (Code on the protection of personal data) as well as EU Regulation 2016/679 (GDPR).

## 2) Relations with employees and collaborators

### Professionalism and Trust

The Company values the professionalism of its collaborators, promoting internal and external collaboration and sharing, in order to improve and increase the wealth of professional skills possessed by each one.

The companies believe in competition as a commitment to improvement and, as such, an indispensable factor for development and progress within a team environment.

The companies are aware that the high professionalism of their employees and their dedication to Techniconsult and Tecma are essential factors; for this reason they protect professional development and condemn all forms of recommendation and patronage.

### Impartiality

Companies act in full respect of human capital, fostering a sense of belonging and enhancing professionalism, integrity and a sense of responsibility, in compliance with the principles of freedom, human dignity and respect for diversity, and repudiating any discrimination based on age, gender, race, language, personal and social conditions, religious and political beliefs.

Furthermore, the companies undertake to ensure that all the resources involved are given the same opportunities to express their professional potential, without distinction.

Each Head of Function shall pay due attention and, where possible and appropriate, take an active part with regard to any suggestions or requests that may be received from his or her collaborators, encouraging motivated participation in the company's activities.

Each Head of Function is obliged to:

- to set an example by their own behaviour for their direct resources and to direct such employees and collaborators to comply with this Code of Ethics;
- ensure that they understand that compliance with the rules of this Code of Ethics is an essential part of the quality of work performance;
- report to the Board of Directors any information provided by employees, collaborators or its own findings concerning possible or even doubtful cases of violation of the provisions of this Code;
- do not engage in any gender discrimination.

### External collaborators and consultants

External collaborators and consultants shall follow ethical and legal conduct in the affairs of the Companies, committing themselves to comply with the laws and regulations in force. The Companies shall not initiate or pursue any relationship with anyone who does not intend to align with this principle.

It is forbidden to pay fees to external collaborators that are not adequately justified by the characteristics of the task to be performed or that are not justified within normal market values.

## Staff relations

Without prejudice to the obligations from the provisions in force, the Company protects equal opportunities in personnel selection, training, management and professional development. Personnel selection is therefore carried out without any discrimination, according to criteria of merit, competence and professionalism.

All Addressees are required to ensure, in the management of labour relations, respect for equal opportunities and manage career and salary advancements on this basis, in a continuous and balanced comparison with the reference market, ensuring transparency, seriousness, fairness and clarity of the assessment methods applied.

The Company is aware that the high professionalism of its employees and their dedication to Techniconsult and Tecma are essential factors; for this reason it protects professional development and condemns all forms of recommendation and patronage.

## Duties of employees and collaborators, including external collaborators

The dynamics that characterise the context in which the Company operates require the adoption of transparent conduct. The main success factor is the professional and organisational contribution that each of the human resources involved ensures.

More specifically, the employees and collaborators, also external, of Techniconsult and Tecma shall:

- refrain from conduct contrary to the rules laid down in this Code of Ethics;
- promptly report to the Board of Directors any news of possible violations;
- conduct themselves with the utmost transparency, correctness and legitimacy, performing their activities with commitment and professional rigour, making an appropriate contribution to the responsibilities assigned and acting in such a way as to protect the prestige and good name of the Companies;
- do not engage in any gender discrimination.

Relations between employees and collaborators, at all levels, must be marked by criteria and conduct of fairness, collaboration, mutual respect and civil coexistence. Each employee of the Companies is responsible for acquiring knowledge of the laws and regulations that concern his or her tasks so as to recognise potential risks and know when to ask for intervention, in support, of the Companies themselves.

Each resource must base his or her activity, whatever the level of responsibility attached to the role, on the highest degree of efficiency, complying with the operational instructions given by the direct supervisor and must contribute, in concert with colleagues and superiors, to the pursuit of common objectives.

Any employee who believes that his or her supervisor wants to induce him or her to engage in unethical or illegal conduct or acts must immediately inform his or her supervisor.

## Duties of staff, employees and collaborators, including external collaborators, towards third parties

In dealings with third parties, the Company's personnel, according to their respective competences, must take care to adequately inform them of the commitments and obligations imposed by this Code of Ethics, demand compliance with the obligations that directly concern their activities, and adopt the appropriate internal and, if within their competence, external initiatives. In the event of non-compliance by third parties



with the obligation to comply with the provisions of the Code of Ethics. The companies' employees and collaborators shall behave correctly in business and in relations with customers, suppliers and third parties in general, irrespective of the importance of the business being transacted.

It is forbidden to offer money or gifts to directors, officers or employees and collaborators of customers, suppliers and third parties in general or to their relatives, unless they are gifts or utilities of modest value. In any case, the type of expenditure must be specifically authorised and accurately documented, identified in the accounts and properly processed for tax or other internal control purposes.

Any employee who is offered gifts or gratuities or receives gifts or gratuities from third parties shall immediately inform his or her departmental head. In the case of Christmas gifts or similar, intended for individual employees, such gifts shall be brought to the attention of one's function manager, who shall express his or her opinion on the possible acceptance. External collaborators who are not employees (e.g. consultants, agents, service providers, etc.) must also comply with the principles contained in this Code of Ethics.

Staff, employees and collaborators, including external collaborators, are prohibited from exchanging goods and services to meet certain expenses, so-called *soft dollars*.

### **3) Enterprise Management**

#### **Compliance with internal procedures**

Techniconsult and Tecma believe that management efficiency and control culture are indispensable elements for the achievement of objectives. Addressees are required to strictly comply with the Company's internal procedures and instructions. The Addressees must act according to their respective authorisation profiles and must keep all appropriate documentation to keep track of the actions undertaken on behalf of the Company.

#### **Accounting management and tax compliance**

In the activity of accounting management, the Addressees are required to act in compliance with the principles of truthfulness, accuracy and transparency, so that the reputation of the Companies is protected both internally and externally. Compliance with these principles also enables Techniconsult and Tecma to plan its operating strategies on the basis of its real economic and equity situation. All items reported in the accounts must therefore be supported by complete, clear and valid documentation, avoiding any form of omission, falsification and/or irregularity. In the case of balance sheet or profit and loss items based on valuations and estimates, the relative recording must be inspired by criteria of reasonableness and prudence.

The companies therefore observe the rules of correct, complete and transparent accounting, in accordance with the criteria indicated by the relevant legislative provisions and the accounting principles currently in force.

The company also undertakes to fulfil with completeness and transparency all the tax fulfilments provided for by the regulations in force and to cooperate, where foreseen, with the financial administration. Tax declarations and tax payments represent conduct that is not only compulsory from a legal point of view, but also unavoidable in the context of the entity's social responsibility.

The addressees of this Code of Ethics are therefore required to cooperate - to the extent of their competence - so that any fact relating to the management of the Company is correctly and promptly recorded in the accounts, as well as to scrupulously comply with the laws in force and the internal procedures so that each operation is not only correctly recorded, but also authorised, verifiable, legitimate, consistent and congruous.

Any violation of the following prohibitions is therefore to be regarded as absolutely contrary to the interests of the Companies: prohibition of introducing, in declarations relating to income tax or value added tax or to other taxes in general, fictitious liabilities or assets; prohibition of issuing or issuing invoices or other documents for non-existent transactions; prohibition of concealing or destroying, even partially, accounting records, or documents whose preservation is compulsory; prohibition of simulated alienation or other fraudulent acts on corporate assets capable of rendering ineffective, in whole or in part, the procedure of compulsory collection by the financial administration. The directors, employees and collaborators of the Companies who become aware of omissions, falsifications or negligence in accounting records or supporting documents, are required to promptly report them to the Whistleblowing Manager according to the procedures governed by the relevant procedure.

### **Social Communications and Tax Offences**

Techniconsult and Tecma provide stakeholders with appropriate communication tools through which they can interact to make requests, seek clarifications or make complaints.

The information disseminated is complete and accurate so that recipients can make correct and informed decisions.

All employees and collaborators involved in the preparation of financial statements or other similar documents must ensure the utmost cooperation, completeness and clarity of the information provided, and the accuracy of the data and processing.

In full compliance with the laws in force on the subject, we recommend full observance of the principles of truthfulness and correctness in relation to any legally relevant document in which economic, asset and financial elements relating to the Companies are highlighted

It is expressly forbidden, through any conduct, to prevent or hinder the performance of control or audit activities legally assigned to shareholders and other corporate bodies. It is also forbidden to disclose to the public supervisory authorities, in the communications required by law and in order to hinder the exercise of supervisory functions, material facts that do not correspond to the truth on the economic, equity or financial situation of the Companies, or to conceal by other fraudulent means facts that should be disclosed. One may not, in any form whatsoever, even by omitting communications due to the aforementioned public supervisory authorities, knowingly obstruct their functions.

## **4) External Relations**

### **Fairness and transparency**

All the actions of the Addressees of this Code of Ethics must be marked by compliance, both formal and substantial, with the regulations in force. The Companies

Techniconsult S.r.l. and Tecma S.r.l., in compliance with the regulations in force and the interests of the stakeholders, undertake to provide complete, timely and truthful information, guaranteeing the transparency of the decisions taken. Complete information must likewise be provided to all those who stipulate, in any form, agreements or contracts with the Companies, so as to clearly represent the conduct expected of them.

### **Relations with Suppliers**

The companies establish collaborative relationships with their suppliers, in compliance with current regulations and the principles of this Code of Ethics, paying attention to the best professional standards, best practices in ethics, health and safety protection and respect for the environment.

In contracts, the Company requires suppliers' commitment to respect the values expressed in this Code of Ethics.

The selection of suppliers and the related products for resale must be carried out, in terms of both quality and cost-effectiveness, in compliance with the commercial policies and strategic objectives defined by the companies.

The selection of other suppliers and the formulation of conditions for the purchase of goods and services is dictated by values and parameters of competition, objectivity, fairness, impartiality, fairness in price, quality of the good and/or service, carefully assessing the service guarantees and the panorama of offers in general.

The purchasing process must be characterised by the search for the maximum competitive advantage and by fairness and impartiality towards any supplier meeting the requirements. Moreover, the cooperation of suppliers must be pursued in order to constantly ensure that customer requirements are met in terms of both quality and delivery times.

The conclusion of a contract with a supplier must always be based on relations of extreme clarity, avoiding, where possible, the assumption of contractual obligations that entail forms of dependence towards the contracting supplier.

In procurement relations and in general the supply of goods and/or services, employees and collaborators are obliged to:

- comply with internal procedures for selecting and managing relations with suppliers;
- comply with and enforce contractual conditions and maintain a frank and open dialogue with suppliers in line with good business practice;
- make the Board of Directors aware of problems that have arisen with a supplier so that it can assess the consequences.

### **Customer relations**

The Customer represents the heart of the Companies' business: work is carried out first and foremost to ensure the growth of the customer. By customer is meant anyone who uses the products and services of Techniconsult and Tecma, in whatever legal form they take.

The employees and collaborators of Techniconsult and Tecma are obliged to:

- comply with internal procedures for managing customer relations;

- provide accurate and comprehensive information about the products and services offered so that the customer can make informed decisions;
- adhere to the truth in advertising or other communications.

### **Relations with public administrations and private stakeholders**

Relations with the Public Administration, as well as with any private interlocutor are inspired by principles of fairness, loyalty and transparency, in strict compliance with the law. Payments to third parties to influence acts of public offices, illegitimate favours, promises or solicitations, even indirect, of personal advantages, corrupt practices or collusive conduct of any kind and in any form are strictly prohibited.

Relationships pertaining to the activity of the Companies entertained with public officials or persons in charge of a public service (operating on behalf of the Public Administration, whether central or peripheral, or of legislative bodies, community institutions, international public organisations and any foreign State), with the judiciary, with public supervisory authorities and with other independent authorities, as well as with private partners who are concessionaires of a public service, must be undertaken and managed in absolute and strict compliance with the laws and regulations in force so as not to compromise the integrity and reputation of both parties.

In general, companies must not allow themselves to be represented in relations with the Public Administration or a private interlocutor by a consultant or a third party when conflicts of interest may arise.

In the course of any business negotiation, it is not permitted to propose or examine proposals for employment opportunities or any other form of collaboration, to offer or receive confidential information and any other activity that may personally benefit the representative of the Public Administration or a private interlocutor.

### **Prevention of corruption**

It is strictly forbidden for employees, collaborators, consultants or any third party working for the Companies to offer gifts or other benefits to managers, officials or employees of the Public Administration or private interlocutors, or to their relatives, whether Italian or from other countries, unless they are gifts strictly related to the celebration of holidays or other ritual festivities and have been authorised by the Management or the delegated functions.

It is absolutely forbidden to offer money.

Gifts and acts of courtesy are therefore permitted only if of modest value and in any case such as not to compromise the integrity and reputation of the parties and cannot be interpreted as aimed at the improper acquisition of advantages for oneself or others, including Techniconsult and Tecma.

The giving of such gifts is in any case prohibited, pending requests, tender procedures or other practices in which the Company is in a position of competitor or in any case of assignee with the Public Administration (except in the case of gifts strictly related to the celebration of holidays or other ritual occasions). It is also prohibited to promise or endorse requests by the Public Administration aimed at obtaining employment at Techniconsult and Tecma, for any reason, of employees or former employees of the Public Administration who have personally participated in negotiations with one of the Companies or in the preparation of opinions, assessments, concessions, authorisations, etc. in favour of Techniconsult and Tecma.

Employees and collaborators and anyone acting on behalf of the Companies may not receive money, gifts or other benefits from any person with whom the Company has relations relating to Company business, unless they are of modest value or have been authorised by the Management or the delegated functions.

Grants, subsidies or financing obtained from the state, other public bodies or the European Community may not be used for purposes other than those for which they were granted.

It is also forbidden to use or present false declarations or documents or certifying untrue things, or to omit due information, and in any case to carry out any artifice or deception in order to obtain the aforesaid grants or any unfair profit to the detriment of the State or other public body. The facts represented and the documentation submitted in order to obtain financing, contributions, subsidies or facilities must be truthful, accurate and complete.

It is forbidden for all employees and collaborators of the Companies who, for any reason whatsoever, directly or indirectly access computer or telematic systems of the Public Administration or of third parties to alter their operation in any way by intervening without right and in any way on data, information and programs.

In selecting suppliers, the Companies shall base their selection exclusively on parameters of quality of the good or service, price, guarantees of assistance, fairness and correctness, avoiding any possible undue pressure such as to cast doubt on the impartiality of the choice of suppliers. When participating in tenders or in negotiations for work, supply and service contracts of the Public Administration, the Companies shall adopt conduct based on the principles of good faith, professional fairness, loyalty and legality towards public bodies and other competitors.

### **Procurement and contract management**

In managing and participating in public tenders or in any case in contracts and agreements with the Public Administration, the Companies operate in full compliance with current Italian and European regulations. The Companies shall refrain from anti-competitive behaviour, i.e. deceptive, fraudulent or unfair conduct contrary to free competition, and censure any attempt to influence those working on behalf of the Public Administration in order to obtain a favourable attitude towards the Company itself.

### **Relations with political and trade union organisations**

Techniconsult and Tecma do not favour or discriminate against any political organisation or trade union. The Companies shall refrain from making any undue contribution in any form whatsoever to parties, trade unions or other social formations, except for specific derogations and in any case always within the limits of what is permitted by current regulations. Recipients are required to abstain from any direct, indirect or boastful pressure on political representatives or trade union representatives.

## **Relations with organisations, foundations and other non-political or trade union associations**

Any financing or sponsorship by the companies to non-profit organisations, foundations, committees or other associations must comply with the regulations in force.

The disbursement of such funding must in any case be expressly authorised by the relevant departments and, in the case of political parties or candidates in elections, by the Board of Directors alone.

Companies may accede to requests for contributions, within the limit of proposals from organisations or associations, intended for initiatives of cultural, charitable, social and humanitarian value and formally approved by the Board of Directors.

## **Media Relations and Information Dissemination**

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

Communications to the outside world follow the guiding principles of truthfulness, fairness, transparency and prudence and are aimed at fostering awareness of the organisation's policies, programmes and projects.

## **5) Compliance with the Code of Ethics, Communication and Training**

Compliance with the Code of Ethics is a duty of each employee or collaborator. Violation of the principles laid down in the Code of Ethics compromises the relationship of trust between the Company and its directors, workers, consultants, collaborators in various capacities, customers, suppliers, business and financial partners.

To this aim, the Companies shall ensure adequate dissemination of the Code of Ethics, of the sanctions provided for in the event of violation and of the methods for inflicting them. The Code of Ethics is brought to the attention of all internal and external stakeholders through appropriate communication activities. The aforementioned parties are required to comply with the principles contained in this document.

It is therefore necessary to make express mention of the above in the contracts concluded with them and to provide them with a copy of the Code of Ethics and verify their knowledge of its contents.

In order to ensure the full and correct understanding of this document by all the Company's collaborators, the Management prepares and organises, also on the basis of the indications of the Supervisory Board, an annual training plan aimed at fostering knowledge of ethical standards and compliance with the laws and regulations in force. The training initiatives are differentiated according to the role and responsibility of the employees.

## **6) Reporting breaches of the Code of Ethics**

Reports of violations of the Code of Ethics must be made by the Addressees in accordance with the Whistleblowing Procedure in force.

## 7) Sanctions

Violation of the principles and provisions contained in this Code of Ethics by directors, employees and collaborators of Techniconsult and Tecma shall give rise to the immediate initiation of disciplinary proceedings, regardless of the possible initiation of criminal proceedings in cases where the conduct also constitutes a criminal offence.

Behaviour by third parties that is contrary to the principles and provisions of this Code of Ethics will be sanctioned in accordance with the specific contractual clauses.