

TM TECNOMATIC SRL

Code of Ethics

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CHAPTER I – INTRODUCTION

TM TECNOMATIC Srl (hereinafter “TMT” or simply “Company”) intends to formally define, with this Code of Ethics (hereinafter the “Code”), the set of values, rights, duties and responsibilities, recognized, accepted and shared by the parties the Company has relations with.

Therefore the Company shall hold relations only with suppliers , representatives, consultants, employees and/or third parties that work in compliance with the standard in force and do refuse to comply with the rules and principles laid down in the Code.

The implementation and application of this Code , its amendments and integrations to the contents is monitored by the Management of TM Tecnomatic SRL.

1.1 RECIPIENTS

The recipients of this Code, pursuant to and by effect of article 2104 and 2105 of the Italian Civil Code and subsequent amendments and integrations, approved by the management of TM Tecnomatic on 26.06.2019, are the Directors, Board of Directors and any party exercising management or control of the Company, whatsoever their legal and formal capacity, employees, suppliers, collaborators, and anyone working in the name of and on behalf of TM Tecnomatic now or in the future hereinafter referred to as “Recipients”. Recipients are obliged to comply with the Code also pursuant to and by the effect of article 2104, to respect the binding principles contained in the Code, whose breach besides damaging the relationship of trust established with TMT, may lead to the adoption of the disciplinary measures in coherence with statutory regulations and any contractual provisions.

The Company furthermore undertakes to promote the contents of the Code to the Recipients, shall distribute an integral copy of the Code and share it in the Company’s website.

1.2 ETHICAL PRINCIPLES

The ethical principles, used by the Company, and described in the following pages, represent essential and inalienable guiding elements for all companies activities.

1.2.1 LAWS AND REGULATIONS

The Company and all parties with which the Company maintains relations, undertakes to act in compliance with the rules and regulations governing the countries where it operates.

Under no circumstances will TMT justify or tolerate any conduct that is in breach of such laws.

1.2.2 HONESTY

Honesty represents the fundamental principle for all TM Tecnomatic Srl activities.

It is on the base of Honesty, correctness, loyalty and mutual respect that all relations with the recipients are founded.

1.2.3 CONFIDENTIALITY

The Company and recipients shall ensure the confidentiality of all confidential and / or reserved information acquired during the course of their activities. The use of any information is limited to the purposes connected to their own function.

“Confidential information” refers to the knowledge of a project, proposal, initiative, negotiations, understanding, agreement, fact or event, even if this is uncertain or in the future, concerning the Company’s sphere of activities, which is not of public domain and which, if made public, could compromise the Company.

All forms of instrumentalisation or use of confidential company information for economic purposes, direct or indirect investment is against the law, and therefore strictly forbidden.

The breach of confidentiality by directors, shareholders, employees or collaborators seriously compromises the relationship of trust with the Company and may lead to the application of disciplinary measures or contractual penalties.

1.2.4 CONFLICT OF INTEREST

The principles laid down in this Code foresee a fully trustworthy relations between the Company and its directors and employees.

In this perspective, the Recipients of this Code shall avoid any situation and abstain from any activity which could place a personal interest against those of the Company or which could interfere with or hinder one's ability to impartially and objectively take decisions in the interests of the Company. They must use the assets of the Company and one’s own professional capacities for the achievement of the interests of the Company, in compliance with the principles of the Code.

1.2.5 WORK ENVIRONMENTAL AND PROTECTION OF PRIVACY

The Company undertakes to assure the dignity of everyone interacting with TMT also in regard to the information concerning private lives, personal opinions to avoid discrimination or conditioning, as laid down in the Code and *Privacy* rules.

The Company undertakes not to interfere in the interpersonal relations among staff, by prohibiting interference in conferences or dialogues and by prohibiting any intrusion or forms of control which may harm anyone’s individual personality.

1.2.6 SAFETY AND HEALTH

The Company is committed to achieving the highest standards of Health and Safety in the workplace, in all its activities in order to safeguard the personal physical integrity and well-being of the Recipients.

1.2.7 USE OF COMPUTER SYSTEMS

Allocated computer resources must be used exclusively for the executions of working activities , under no circumstances it is permitted to use them for purposes that are in breach of the law, public order or morality , racial intolerance, incitement to violence or the violation of human rights, or illegally obtain confidential information.

Under no circumstances it is permitted to install unlicensed software on Company computers or copy documents or material protected by copyright (audio-visual, electronic, paper or photographic recordings and reproductions) without the express permission of the owner.

1.2.8 TRANSPARENCY AND COMPLETENESS OF INFORMATION

TMT considers that accounting transparency and book-keeping based on the principles of truth, completeness, clarity and precision, are fundamental assumptions for efficient control.

For each operation, appropriate supporting documents must be kept in order to facilitate the recording of accounts, assure the traceability of the transaction and identify any responsibilities.

CHAPTER II - EXTERNAL RELATIONS

2.1 - RELATIONS WITH SUPPLIERS AND EXTERNAL COLLABORATORS

The suppliers shall be selected in compliance with the procedures UNI EN ISO 9001:2015 and this Code.

The main parameters are HSE performance, quality, price, capacity and efficiency and type of supply. Gifts, donations in general, are strictly forbidden in supplier and external collaborations' relations. Act of courtesy aiming to obtain favorable treatment even by personal initiative, are strictly forbidden.

2.2 - RELATIONS WITH CUSTOMERS

The customer satisfaction represents an important aim for the Company since it allows to ensure and create solid relations inspired by values of correctness, fairness, efficiency and professionalism.

For this purpose the Company considers it necessary that:

- Customers are never in any way promised results that are not fulfilled ;
- Customers are not advised and / or proposed actions or conduct against the law;
- The relations with Customers shall be on the base of transparency as per the principles of this Code and regulations in force.

The breach of the Principles contained in the Code shall be considered as a breach to the deontological principles and the duties of correctness.

TMT undertakes to manage documentation received from the customer according to the conduct criteria and principles contained in the Privacy and in this Code.

Therefore information received shall be used for working activities and not for personal interest.

CHAPTER III - APPLICATION AND DISSEMINATION OF PRINCIPLES

This Code aims to identify the relative fields of applications and the general principles that Recipients must have in the working relations.

For this purpose the Company undertakes to inform all Recipients of the contents of this Code.

Every director and employee must therefore sign a specific declaration in which he/she confirms that he/she is informed of its contents and accepts them.

3.0 RELATIONS WITHIN THE COMPANY

The principles and values contained in this Code are based on the internal behavior of the whole organization.

3.1. RELATIONS BETWEEN EMPLOYEES

Relations between Company employees are based on values of civil co-working and the respect for personal rights and liberties and the fundamental principles underlying equal social dignity without discrimination based on nationality, language, gender, race, religious beliefs, political or trade union affiliations and physical or mental conditions.

The employees shall comply with and apply the principles of diligence, honesty and equality, promoting mutual collaboration, striving to create a suitable professional working environment in compliance with the trade union prescription in force

3.2. RELATIONS BETWEEN COMPANY MANAGEMENT AND EMPLOYEES

The Company management shall not abuse its positions towards employees, suppliers, customers and partners.

The management is bound to exercise its powers from any harassment and / or intimidation towards the employees and in the recruitment of employees aiming to violate the principles of everyone.

The Employees shall follow the disciplinary rules.

The Employees are bound to comply with the instructions given and to execute them diligently, provided such orders are not clearly in contract with the laws in force and / or principles laid down in this Code.

The employees shall report any situations which may be in contrast with the laws in force or laid down in this Code.

CHAPTER IV - VIOLATION OF THE CODE OF ETHIC AND SANCTIONATORY SYSTEM

4.1 - REPORTING BREACHES

Concerning the effective requested or attempted breach of the principles contained in the Code, the Company shall guarantee that, at work, nobody may suffer retaliation, unlawful conditioning, difficulties or discrimination of any kind whatsoever for having reported the breach of the contents of the Code or any internal procedures.

All presumed breaches concerning the crimes laid down in D. Lgs. n. 231/2001 must be reported to the Company Management.

In any case, all reports of breaches must provide sufficient information to be able to identify the terms of the breach in order to ensure the appropriate analysis.

4.2 PENALTY SYSTEM GUIDELINES

The breach of the principles laid down in the Code compromises the relationship of trust established between the Company and its Recipients.

Such breaches shall be pursued incisively, promptly and immediately by the Company through appropriate and proportionate disciplinary proceedings, whatever the criminal importance of the matter and without prejudice to the adoption of criminal proceedings in such cases that constitute crimes.

If the breach committed also concerns the violation of the Organization and Management Model adopted by the Company, the sanctions laid down by the Disciplinary System foreseen by the C.C.N.L. of category, are applied.

The effects of any breaches of the Code must be held in serious consideration by all those holding relations of any kind with TMT. The Company disseminates the Code and informs of the sanctions laid down in the event of breach as well as the method and procedures for application referring to the "C.C.N.L." (national collective bargaining contract) for employees of the mechanical field.

To protect its image and safeguard its resources, the Company shall not hold relations with any parties who do not intend to work in strict compliance with the laws in force and/or who refuse to behave in line with the values and principles laid down in this Code.