CODE
OF CONDUCT

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Welcome to TESISQUARE®

CONNECTING PEOPLE, DATA,
TECHNOLOGIES AND PROCESS
IN A DIGITAL SUPPLY CHAIN ECOSYSTEM

1

PREAMBLE

1.1 Respect, first and foremost, a value for you

This document - the Code of Conduct - is incorporated as an integral part of the system and organisational model pursuant to Legislative Decree 231/2001 with which Tesisquare S.p.A. has endowed itself. This document regulates the set of rights and responsibilities that our Organisation assumes towards all parties with whom it interacts in the course of its activities.

In drafting this Code of Conduct, we have drawn inspiration from our history, from the ideals that have inspired the founder Mr. Giuseppe Pacotto from the very beginning in the path he has taken. As well as those principles of social responsibility that have always been our guide and which are largely reflected in this document.

We believe in the value of work and the respect for the individual (whether colleague, customer or supplier), legality, correctness and transparency of action are deemed to be essential prerequisites even before the achievement of economic, production and social objectives. In the pursuit of our mission, we constantly apply the principles stated in this Code of Conduct.

In addition to affirming our identity, the purpose of this document is to introduce and make binding for our Organisation the principles and rules of conduct that are also relevant for the purposes of preventing the offences indicated in Legislative Decree 231/2001.

Therefore, this Code of Conduct is considered an integral part of existing and future employment contracts; compliance with its content is part of the obligations of diligence required under Article 2104 of the Civil Code 'Diligence of the employee'.

Employees therefore undertake to adapt the way they perform their work to the purposes and provisions set out in this Code of Conduct, both in intra-Organisation relations and in relations with parties outside the Organisation, and in particular with the Public Administration and other public authorities.

As for collaborators, consultants and self-employed workers (specified below among the recipients of this Code) who work with the Organisation and other third parties, the signing of this Code of Conduct or an extract of it or adherence to the provisions and principles contained therein represent a sine qua non for the stipulation of contracts of any nature between our Organisation and those subjects. The signed or approved provisions, even for conclusive facts, are an integral part of the contracts entered into with the Organisation.

In light of this, any violations by the above-mentioned subjects of specific provisions of the Code of Conduct, based on their gravity, may legitimise the Organisation's withdrawal of the contractual relationships in place with the aforementioned subjects and may also be identified ex ante as causes of automatic termination of the contract pursuant to art. 1456 of the Italian Civil Code "Express termination clause".

1.2 The recipients of the Code of Conduct

By adopting this Code of Conduct, our Organisation has intended to define moral values, clear rules and procedures to comply with.

The Code of Conduct is addressed to:

- members of governance and collegial bodies;
- employees (with any contractual form provided for by law);
- continuous coordinated collaborators;
- external and internal consultants, agents;
- goods and services suppliers;
- any other person who may act in the name and on behalf of the Organisation either directly or indirectly, permanently or temporarily, and those who establish any kind of relationships with the Organisation and work to pursue its objectives.

The recipients of this Code of Conduct are required to learn its contents and to respect its precepts.

Violation of these provisions, specifically, will constitute a disciplinary offence for employees and as such may be prosecuted and sanctioned by our Organisation pursuant to art. 7 "Disciplinary sanctions" of Law no. 300/1970 (so-called Workers' Statute) and may entail compensation for any damage caused to it.

The Code of Conduct will be made available to them, as specified below.

The CEO empowers specific internal parties to provide for the distribution of the Code of Conduct within and outside the Organisation, for

example through publication on the Organisation's website or through other channels identified from time to time according to the recipients.

The respect - by the recipients - of the principles and provisions contained in this Code of Conduct is an essential requirement of any fruitful working relationship with our Organisation. To this purpose, at the time of the stipulation of contracts or agreements with subjects that are part of the list of recipients, the Organisation provides its interlocutors with a copy of this document (for example, attaching it to the contracts).

2

PRINCIPLES OF CONDUCT OF OUR ORGANISATION

2.1 Preamble

The principles listed hereafter are considered fundamental and for this reason our Organisation undertakes to respect them towards anyone. It is also essential that these values do not remain mere statements but result in actions and behaviour hat the Organisation implements in its daily actions.

The **fundamental values** on which the activity of our Organisation is based are:

- integrity in compliance with laws and regulations;;
- repudiation of all forms of discrimination;
- centrality, development and enhancement of human resources and equity when carry out business activities;
- internal and external solidarity;
- historical identity;
- transparency and business ethics;
- quality of work, flexibility and dynamism;
- perseverance, commitment and prevalence of common objectives over individual ones;
- legality and fight against terrorism and crime.

2.2 Integrity of behaviour and compliance with laws and regulations

Our Organisation is committed to creating and providing quality products and services. We compete on the market according to principles of fair and free competition and transparency, maintaining correct relationships with all public, governmental and administrative institutions, with citizens and with other companies.

> Everyone must operate, in any situation, with integrity, transparency, consistency and fairness, conducting every business relationship with honesty. We operate in strict compliance with the law and we strive to ensure that all personnel act accordingly. Everyone must behave in accordance with the law, whatever the context, the activities and the place where their duties are carried out.

Such commitment must also apply to consultants, suppliers, Customers and anyone who has relations with our Organisation (or on behalf of our Organisation with third parties). The Organisation will not initiate or continue any relationship with anyone who does not intend to align with this principle.

2.3 Rejection of any form of discrimination

The Organisation avoids any discrimination based on the age, sex, state of health, race, nationality, political opinions and religious beliefs in decisions that affect relations with the resources that are part of our Organisation (e.g., personnel management and activity organisation), but also with third parties (e.g., selection and management of Suppliers, relations with the surrounding community and with institutions representing it).

2.4 Centrality, development and enhancement of human resources and equity in the conduct of business activities

> Our Organisation recognises the centrality of human resources and believes that an essential factor for success and development is the professional and human contribution of the people who work in there.

We have always placed professionalism and the individual contribution of people at the centre of our work, giving continuity to a manner of relationship that aims to recognise the work of each one as a fundamental element for the development of our Organisation and of the people who are part of it.

Contextually, our Organisation places at the centre of its daily work: dialogue, the exchange of information at any level, the enhancement and professional updating of its collaborators, the establishment of an identity and the related sense of belonging. These values result into:

- the creation of a work environment capable of enhancing the contribution and potential of the individual through the gradual empowerment of the personnel;
- the creation of a relation system that favours teamwork over a hierarchical relationship;
- the daily effort aimed at sharing skills, knowledge and values also through the use of innovative processes.

Our Organisation gives the utmost importance to those who work within it, contributing to its development. Indeed, through **human resources** the Organisation is able to provide, develop, improve and guarantee optimum management of its products and services.

> Without prejudice to the legal and contractual provisions regarding the duties of workers, employees are required professionalism, dedication to work, loyalty, spirit of collaboration, mutual respect, and sense of belonging and high morality are encouraged.

In the management of contractual relationships that entail the establishment of hierarchical relationships, the Organisation commit to ensuring that authority is exercised with fairness and correctness and that any form of abuse is avoided. We guarantee that authority does not turn into an exercise of power that damages the dignity and autonomy of the person.

Such values must be safeguarded at all time when making choices regarding the organisation of work.

2.5 Solidarity

A **spirit of solidarity** within the Organisation among employees is essential. It has to reflect tangible initiatives aimed, for example, at supporting those who may go through moments of personal difficulty.

> Attention and solidarity are achieved through the contribution of each one. This is why many initiatives are developed to support families who have suffered a loss, or who are experiencing significant difficulties.

This solidarity also expands outside the Company walls, with the promotion and adhesion to social initiatives of various nature.

Furthermore, the Organisation proves to be increasingly aware and sensitive to the issue of **economic, social and environmental su-**

stainability, including in its strategic choices. We have in fact started a process of normalisation of our practices with respect to the necessary requirements in order to implement the CSR (Corporate Social Responsibility) and to achieve the certification in the near future.

2.6 Strong local rooting with international ambitions

Our Organisation is active and will continue in ensuring that there is a strong interaction and collaboration with the territory, also ensuring that the entities collaborating with it comply with the same behavioural standards and orient their activities towards the same principles and values.

We promote local development through a strong connection with the different actors of the territorial community of reference. We therefore act in the local community for the development of a rich and generative society, capable of recognising and enhancing the resources that shape it, the existing skills and potential, gender, cultural and ethnic differences, promoting integration and social development.

> Despite the strong connection to the territories in which our business originated, the Organisation has developed over the years a constant expansion on national and international scale, achieving important and ambitious business objectives, constantly evolving. As proof of this, over the years we have opened numerous new offices in the main Italian, European and American cities.

2.7 Transparency and business ethics

The history, identity and values of our Organisation are embodied in a business ethic based on:

- **reliability**: intended as a guarantee of utmost seriousness in projects, transactions and commitments undertaken;
- **solidity**: related to an Organisation that is anchored on solid and defined assets foundations, as evidenced by its prolonged and profitable activity;
- **transparency**: consequent to the conception of our social role, which requires not only respect of principles and ethical values, but also the implementation of methods that allow the communities of reference and social actors to have access to information in order to reconstruct our work;
- **correctness in contractual context:** avoiding that - in existing relationships - anyone who works for and on behalf of the Organisation tries to take advantage of contractual gaps or unforeseen events in order to exploit the position of dependence or weakness in which the interlocutor might be;
- **protecting fair competition**: refraining from potentially harmful behaviours towards competitors.

2.8 Quality of work, flexibility and dynamism

Quality is a distinctive element of our Organisation.

> Everyday we commit and take responsibility for ensuring quality in every activity we perform, in line with our long-term strategy. For the purpose, the Company has adopted and divulged a precise quality policy, which it constantly and daily applies in its work.

The customer-centric approach adopted by our Organisation means not only providing support to the customer throughout the entire life cycle of the product/service, but also making every effort to meet the customer's needs and expectations, finding solutions and answers together.

2.9 Perseverance, commitment and spirit of collaboration

Perseverance of the journey, **maximum commitment** towards colleagues and Customers, a **sense of strong responsibility** towards our work, our Customers and the ecosystem in which we operate have always characterised the growth path of our Organisation.

Such spirit must define not only the approach of internal employees but also of all those collaborators, partners, suppliers, and the entire ecosystem of companies in which Tesisquare S.p.A. ranks.

2.10 Legality and fight against terrorism and crime

The Organisation deeply believes in democratic values and condemns any activity that may have purposes of terrorism or subversion of the democratic order. The Organisation, in particular, condemns any activity involving, by way of example and without any limitation:

- forgery, counterfeiting, alteration and/or use of coins, legal tender and revenue stamps;
- acceptance of takings from criminal activities (money laundering);
- unauthorised access to external IT systems;
- illegal possession of access codes;
- damage to equipment and data;

- fraud in the management of electronic signature certification;
- fraud in the management of administrative, accounting and tax processes;
- wiretapping, obstacle and interruptions of computer communications;
- spreading ideas of tolerance and silence relating to drug use or any form of addiction;
- incitement to carry out illegal acts or contrary to the moral sense;
- negligence in fighting violence, damage to public objects and compliance with internal regulations;
- propaganda of ideas based on superiority or racial or ethnic hatred;
- incitement to commit acts of discrimination or acts of violence for racial, thnic, national, religious or sexual orientation reasons;
- incitement to commit gender-based acts of discrimination or acts of violence. Such acts are contrary to the promotion of the principle of equal treatment between men and women with regard to access to work, training, professional promotion and working conditions.

2.11 Fight against tax evasion

Our Organisation is committed to complying with all the obligations imposed by tax legislation and to collaborate, where necessary, with the financial administration and the regulatory authorities. Tax returns and remittance represent behaviours that are not only mandatory from a legal point of view, but also unavoidable in the context of the social responsibility of our Organisation.

We explicitly prohibit all behaviours that may in any way facilitate the perpetration of criminal acts that may entail the participation of our Organisation in criminal proceedings pursuant to Legislative Decree 231/2001. Any violation of these prohibitions is absolutely contrary to the interest of our Organisation.

3

SOCIAL ACTORS

3.1 Customers

The full satisfaction of the needs of the Customers, on which our work and success are based, is the primary objective of our Organisation. We aim to a relationship characterised by trust, esteem, collaboration and respect.

> In this context, we ensure our Customers the best job performance and we are always oriented to propose solutions as close as possible to their needs and expectations. We like to think that we are not mere "suppliers" to our Customers: we aspire to be a "one partner" by promoting innovation through our skills.

For this reason, our Organisation provides, in the context of commercial relationships, accurate, truthful and exhaustive information in relation to the type of products offered and services provided, so that the Customer fully informed can make decisions and can experience the highest level of satisfaction.

We also protect the privacy of our Customers in accordance to the current applicable regulations, namely the Reg. (EU) 679/2016 and the Legislative Decree 196/2003 subsequently updated by Legislative Decree 101/2018. We specifically protect the privacy of personal information, without prejudice to legal obligations.

We adopt a communication approach based on **efficiency**, **collaboration** and **kindness**, both with Customers and with any person who interfaces with our Organisation.

3.2 Banks and financial institutions

Our Organisation maintains relationships with banking and financial institutions based on fairness and transparency, in order to create value for the Organisation itself.

For this reason, banking and financial institutions are chosen according to their reputation and adherence to values similar to those expressed in this Code of Conduct.

3.3 Suppliers/Consultants/Agents

3.3.1 Goods and services suppliers

The Organisation defines collaborative relationships with its Suppliers, in compliance with the applicable regulations and the principles of this Code of Conduct. We pay close attention to the highest professional standards, the best practices in ethics, health and safety of workers and respect for the environment.

3.3.2 Consultants and agents

Consultants and agents are chosen in relation to professionalism and reputation as ell as reliability and adherence to values comparable to those expressed in this document.

Relations with such subjects are based on clear agreements and a constructive dialogue aimed at achieving common objectives, in line with the regulations and principles of this Code of Conduct.

3.4 Public Administration

Our Organisation inspires and conform its conduct to principles of c**orrectness** and **honesty**, in its relations with the Public Administration, as well as in its relations with individuals.

Based on such premise, those appointed by the Organisation to follow a negotiation, a request or an institutional relationship with the Public Administration, whether Italian or foreign, must not for any reason try to improperly influence their decisions or engage in unlawful behaviour, such as the offer of money or other benefits. Such actions may alter the impartiality of judgment of the representative of the Public Administration.

> Those appointed by our Organisation to manage relations with any authority of the Public Administration must verify that the information provided regardless of how and in any capacity is true, accurate and correct.

Those who are allowed to have direct contact with the Public Administration on behalf of the Organisation are the only people expressly authorised by the Organisation itself.

In particular, the Organisation adopts the following prohibitions:

- give money donations to public officials;
- give gifts and presents that are not in accordance with the Company regular practice. In particular, in favour of public officials or subjects linked to them by family ties. Such actions may be interpreted as an intention to influence the independence of judgment of such subjects. We allow gifts that do not exceed the value of Euro 100.00. Donations of a different value must be interpreted as sponsorships and/or donations for charity and as such they must be authorised and treated according to Company procedures set for such purpose;
- granting advantages of any kind in favour of representatives of Public Administration entities that may have the same consequences as listed in the previous point;
- receive money, gifts or any other benefit or even accept the promise of them from anyone who is or intends to start a business relation with the Company and wishes to unduly obtain treatment in violation of the law or the provisions issued by the Company or a more favourable treatment than that due;
- perform services or pay compensation in favour of external collaborators and partners that are not adequately justified in the contractual relationship in place with the Company;
- submit untruthful declarations to national and/or EU public institutions in order to obtain grants, contributions or subsidised loans for oneself or other parties;
- reallocate potential sums received from national and/or EU public institutions for purposes other than those for which they were originally intended;
- access the Company computer network without the necessary permissions, whether the access is aimed at inserting/modifying or communicating to/from third parties the information contained therein. It is also prohibited the access aimed at any intervention on the programmes that process data referred to the Customers in general and to the Public Administration in particular.

3.5 Subsidies and Fundings

Any contributions, grants or loans obtained from the European Union, the State or any other public institution, including those of small value and/or amount, must be used only and exclusively for the purposes for which they were requested and granted.

Our Organisation strictly prohibits the recipients of this Code of Conduct from using any funds received by Public Administrations and/or any inter-professional funds, for purposes other than those for which they were provided.

Similarly, in the event of participation in public tender procedures, the recipients of this Code of Conduct are required to operate in compliance with the law and correct commercial practice, in particular avoiding inducing Public Administrations to unduly operate in favour of the Organisation.

It also constitutes illicit behaviour under this Code of Conduct the use of altered or falsified declarations or documents or the omission of information or, in general, the performance of tricks or deceptions, aimed at obtaining concessions, authorisations, loans, contributions from the European Union, the State or other public institution.

3.6 Political forces, associations and interest-bearing institutions

We transparently interact with all political forces, associations in the area and public institutions (territorial and national) in order to duly represent our position on matters and issues of interest.

4

PRINCIPLES OF CONDUCT TO BE FOLLOWED BY EMPLOYEES

4.1 Professionalism

Each person carries out his work and their services with **diligence**, **efficiency** and **integrity**, making the best use of the tools and time at their disposal and assuming the responsibilities connected with their obligations.

4.2 Loyalty

Everyone is required to behave loyally and correctly towards the Organisation and other employees.

4.3 Honesty and Legal compliance

> Honesty and legality are the fundamental principles that rule all activities of the Organisation and its endeavours; they represent core values of the company's organisational management.

Relations with stakeholders, at all levels, must be carried out according to criteria of correctness, collaboration, loyalty and mutual respect. In no case can the pursuit of the Organisation's interest justify dishonest and illegal conduct. In addition, as part of their work, the people who work in our Organisation are trained and required to be aware of, and diligently comply with **Model 231**.

4.4 Correctness and Transparency

Personal use of information, assets and equipment provided for the fulfilment of asks and assignments, is not permitted.

No partner will accept nor make, neither on their own, nor on others' behalf, pressure, recommendations or reports that may harm the Organisation or bring unfair advantage for themselves, for the Organisation or for third parties. No unfair offers of money or promises of other benefits will be made nor accepted by any of the partners.

The Organisation sets out to operate in a straightforward and transparent manner, without favouring any group of interest or individual.

4.5 Confidentiality

All Organisation personnel, as well as external consultants, ensure the utmost confidentiality with regard to all news and information concerning the Organisation's assets and activity, in compliance with existing law, internal procedures and circulars, contractual clauses, etc. Our Organisation expressly prohibits the dissemination of relevant information within or outside the Organisation, except through the institutionally provided and

established channel.

Furthermore, all Organisation staff are required to sign a specific non-disclosure agreement (NDA) to prevent them from using any confidential information that may come into their possession during business-related activity, for purposes other than the business itself.

4.6 Responsibility towards the community

The Organisation is aware of its role in the economic and social development as well as the general well-being of the community across operating territories. All projects are intended to be carried out with the utmost respect for international, national and local communities, and full support to initiatives of cultural and social value, in order to uphold the Organisation's reputation and legitimacy.

4.7 Resolution of conflicts of interest

Associates pursue, in carrying out their work, the objectives and general interests of the Organisation.

They promptly inform their managers or direct superiors of any situation or activity in which their own interest, or the interest of a close relative of theirs, may potentially conflict with the Organisation's, or should relevant reasons of convenience arise.

Associates respect all the Organisation's decisions in this regard.

4.8 Sense of belonging

Associates must refrain from carrying out any activity that could hinder or prejudice in any way the building of a sense of belonging to their organisation or work group.

> Collaboration, teamwork and sharing are fundamental elements of our way of understanding work: we like to think that, both successes and setbacks that may be encountered along the way, are not just "mine" or "yours " - They're "ours "

4.9 Mutual respect

All people collaborating in any capacity with the Organisation actively manifest, and expect in return, unconditional respect for the duties, skills, working methods of others, if necessary through the omission of their own uncalled for personal considerations to third parties. Obviously, none of this can be pursued without embracing the basic respect and dignity each person is entitled as a human being, regardless their rank.

5

CRITERIA OF CONDUCT

5.1 Introduction

The rules presented in this section are meant to point out the **attitudes** and **behaviours** that are to be observed when the recipients of this Code carry out their activities within the Organisation, in compliance with the values that inspire this document.

All recipients of this Code of Conduct must display **correct and transparent behaviour** while carrying out their function, thus contributing to the effectiveness of the internal control system which protects our Organisation's value.

All recipients are expected to abide by the law and fully cooperate at all times with corporate bodies and external supervising authorities.

5.2 Health and Safety at work

We are committed to creating a work environment staff and guests can entrust their health and safety to, while promoting and consolidating a culture of safety, risk awareness, and responsible behaviour.

> We also strive to protect the health and safety of our workers, especially through precautionary measures. Protecting human resources is one of our main goals. In order to do so, we constantly seek the necessary synergies both internally and with suppliers, external consultants and customers involved in the Organisation's activities.

The Organisation adopts general measures for the protection of health and safety in the workplace as prescribed by legislation, with particular reference to the provisions of Legislative Decree 81/08 and subsequent amendments. In particular:

- we define the operating procedures to be followed and coordinate activities relating to health and safety in the workplace;
- we ensure the enforcement of current regulations creating risk assessment documents and defining work methods in line with current safety standards;
- we constantly monitor possible legislative changes and work towards their implementation.

Furthermore, our Organisation commits to ensuring:

- the eradication of risks and, when unattainable, their minimisation according to technological state-of-the-art;
- compliance with ergonomic principles applied to work environment, when it comes to its planning, design, choice of equipment and definition of work methods, particularly in order to reduce the negative impact of monotonous and repetitive work on personnel's health;
- the replacement of what is dangerous with what is not or is less dangerous;

- health surveillance of workers;
- adequate information and training for workers, the workers' safety representatives (RLS) and all staff;
- adequate instructions to workers;
- emergency measures to be taken in case of serious and immediate danger and when first aid, fire fighting, evacuation are needed;
- use of warning and safety signs;
- regular building and systems maintenance, with particular regard to safety devices;
- adequate instructions to employees and collaborators and their training in accordance with the provisions of the law.

All employees must comply with the internal rules and procedures regarding the protection of health and safety and to promptly report any shortcomings or noncompliance with applicable regulations.

5.3 Cybersecurity

Protection of corporate IT systems and information in digital format is deemed extremely relevant by the Company. Indeed we have pledged a constant commitment to the security of communications and the fight against cybercrime.

> Thus, the Company does not consider and apply cybersecurity merely as a set of technological protection solutions, but it deems and manages it as a real development process that leads to the creation of a thoroughly designed corporate security programme.

Five essential elements - explained below - describe the Company approach to security.

- **governance**: the achievement of a full understanding of corporate assets, operational processes and of the correlation between them are paramount to the Company. This allows to accurately assess risks, and to activate the proper countermeasures in order to ensure that all assets are provided at all times with clear security levels based on their criticality.
- **management**: the all-round visibility of all occurrences within the Company's physical and virtual perimeter is cornerstone for the correct management of cybersecurity at Tesisquare S.p.A.. Only this way can security breaches be promptly detected and the necessary measures to effectively contain them can be taken, in order to restore full productivity.
- **awareness**: technology alone is not enough to achieve security goals. Employee awareness of the risks and threats they face while using work tools is fundamental. Furthermore, the entire supply chain - made up of external suppliers, Customers and external users - must share an equally high level of awareness in terms of corporate cybersecurity.
- **incident**: the Company considers it appropriate to provide processes and solutions that constantly monitor the status of its critical infrastructures and any anomalies that may possibly arise. This allows for a prompt reaction and therefore the containment of any damage the incident might cause.
- **compliance**: the Company considers it essential to monitor national and international regulations, laws and industry standards, to which it must always be compliant.

5.4 Xenophobia e racism

We highly value the respect of the legislation on the fight against any form and expression of racism and xenophobia. Our Organisation therefore repudiates any activity that may involve the propaganda of ideas based on superiority or racial or ethnic hatred; the incitement to commit acts of discrimination; the perpetration of acts of discrimination for racial, ethnic, national or religious reasons. We repudiate all the above even when such behaviour is manifested by denial, serious minimisation or defence of crimes of genocide, crimes against humanity and war crimes.

5.5 Individual personality

We highly value **the protection of the person, of freedom and of individual personality**. The Company, therefore, rejects any possible exploitation or submission of the person and any activity that may result in any damage to the individual's safety.

Our Organisation condemns any behaviour that has coercive, offensive, threatening connotations or aimed at intimidating people, including all practices related to the phenomenon of mobbing.

Moreover, it is forbidden, on the basis of public and/or available information in compliance with current regulations, to establish and maintain relationships with subjects who, even indirectly, hinder human development and contribute to not respecting human dignity and individual personality and/or to violate the fundamental rights of the person. It is also forbidden to acquire, use, distribute and/or transfer child pornographic material, even through the use of IT tools and virtual images.

5.6 Organised crime and terrorism

Our Organisation strongly condemns and fights with all tools available any form of organised crime, including of a mafia nature.

The recipients must pay close attention when working in areas historically affected by organised crime phenomena - both in Italy and abroad - in order to prevent the risk of criminal infiltration.

TESI guarantees strong commitment in verifying the due requisites of **integrity** and **reliability** of commercial counterparties (such as suppliers, customers, consultants, contractors, associates in participation, etc.).

No commercial relationship will be undertaken or continued with commercial counterparties whose membership or contiguity in criminal organisations is even reasonably suspected, or who are suspected of facilitating in any form, even occasional, the activity of criminal organisations.

5.7 Protecting the Environment

Our Organisation is aware of the direct and indirect impact of its activities on economic and social development and the general well-being of the community, as well as the importance of social acceptance of the communities in which it operates.

> The Company therefore plans its activities by seeking a balance between economic initiatives and essential environmental needs, not only in compliance with current legislation, but also in consideration of the rights of future generations.

Our Organisation is committed to ensuring that projects, processes, methodologies and materials take into account the development of scientific research and the best experiences in environmental matters, in order to respect the territorial balance, the prevention of pollution, the protection of environment and landscape.

5.8 Obligations of Division Managers towards the Code of Conduct

Each Division Manager - identified as such in the Organisation chart, job descriptions and/or system of proxies - has the obligation to:

- ensure that all staff - directly or indirectly beneath their responsibility - is compliant with the Code of Conduct;
- set an example for their collaborators with their behaviour;
- make every effort to ensure that their collaborators understand that the provisions contained in this Code of Conduct are an integral part of their work performance;
- promptly report to the CEO (or to people delegated by them or to the Supervisory Board) any warning concerning the failure to comply with the behavioural principles established by this Code.

6

FINAL PROVISIONS

6.1 Approval Process and Amendments

Any changes and/or additions to this Code of Conduct will be approved by the BoD after consultation with the Supervisory Board and promptly distributed to all recipients. In particular:

- the Supervisory Board periodically reviews the Code of Conduct for legislative or corporate changes and proposes the changes and/or additions that may be deemed as necessary from time to time;
- the BoD examines the proposals of the Supervisory Board and deliberates accordingly, making the approved changes immediately operational. The new versions of this Code of Conduct will be made available to all employees and published on the virtual bulletin board in the designated folder.