

The Code of Ethics is an integral part of this Model and is approved by the sole Administrator of G.P.TECNICA s.r.l. as determined on September 1, 2017

### ***Preamble***

GPTECNICA srl's Code of Ethics identifies the primary business values that the Company intends to comply with in its current operations and establishes the company's principles, rights, duties and responsibilities vis-à-vis employees, partners, customers, suppliers and public authorities, as well as their obligations.

This document highlights the set of rights, duties and responsibilities of all those who, in any event, work for the Company with regard to all its interlocutors.

The adoption of the Code of Ethics is an expression of a precise business choice and is a manifestation of the Company's sensitivity to the need to ensure compliance with the law as well as conditions of fairness and transparency in the conduct of business and in carrying out business activities in a framework of fair competition, honesty, integrity, fairness and good faith, principles that G.P.TECNICA s.r.l. also intends to promote, through the widespread dissemination and familiarity of the Code of Ethics and the Model with all those who will enter into relationships with the company.

All those who work in G.P.TECNICA s.r.l. without distinction or exception, must commit themselves to observing and ensuring compliance with these standards as part of their duties and responsibilities. The conviction of acting for or in the interest of G.P.TECNICA srl, for whatever reason, will never in any way justify the adoption of behaviours which contrast with these principles

## **Art. 1 - Applicability and respect of the Code of Ethics**

1.1 Workers are defined as all persons covered by the Code of Ethics and therefore include:

- a) the directors and members of the corporate bodies of G.P.TECNICA s.r.l.
- b) general managers and any other person in an apical position, therefore any person acting as representative, administrative or management, or who, in any event, exercises, in fact, the management and control of the company or its units or divisions (the "Corporate Exponents");
- c) All those hired and therefore working for G.P.TECNICA s.r.l. under an employment contract, which is the negotiation type. This includes full time and part time workers.
- d) the Collaborators and all those who, directly or indirectly, permanently or temporarily, establish with G.P.TECNICA s.r.l. relations and relationships or, in any event, work to pursue the company's objectives in all the countries in which the Company operates;
- e) Suppliers, identifying with such terminology all those who, permanently or temporarily, lend in any form whatsoever goods and / or services to G.P.TECNICA s.r.l.

1.2 G.P.TECNICA s.r.l. guarantees:

- the widest possible diffusion of the Code of Ethics;
- the respect of the values and principles set out here through appropriate procedures, regulations and instructions;
- the anticipation, if necessary, of the implementation of specific contractual clauses for Employees, Partners and Suppliers;
- the updating the Code of Ethics so that it may adapt to the evolution of Civil sensitivity, company environment and and regulations relevant to the same;
- the conduction of audits of any violation of the Code of Ethics;

- the assessment of the facts and the consequent implementation, in the event of an established breach, of appropriate sanctioning measures;
- protection, especially from retaliation of those who may have reported information regarding possible violations of the Code of Ethics and / or the reference standards.

**1.3** All workers must know the Code of Ethics and observe its provisions both in their relations (internal relations) and in relations with third parties (external relations), to contribute actively to its implementation and to report any deficiencies to the relevant reference function.

For Non-Employees, compliance with the Code is a prerequisite for continuing the professional or collaborative relationship with G.P.TECNICA s.r.l.

## **Art. 2 - General Principles**

G.P.TECNICA s.r.l. aims to characterize transactions, behaviours and relationships, both internal and external, by following these fundamental values:

- **legality, honesty and fairness:** G.P.TECNICA s.r.l. works in compliance with the laws in force, with internal rules and regulations and the present Code. Under no circumstances will the pursuit of the interest of G.P.TECNICA s.r.l. justify behaviour which contrasts with the principles of fairness and legality. G.P.TECNICA s.r.l. works, within its corporate organization, for the dissemination and knowledge of all laws, the Code and procedures aimed at preventing any legal violations;
- **integrity:** in relations with employees and third parties G.P.TECNICA s.r.l. is committed to acting in a proper and transparent manner, avoiding misleading information and behaviours such as to obtain an undue advantage from positions of disadvantage of third parties;
- **loyalty and good faith:** relations with employees and third parties must be characterised by good faith and trust, which therefore means the maintenance of any agreements or promises, the patents, the enhancement of the company's assets and the pursuit of good faith in every decision;
- **relations with public authorities:** any relations with public authorities and Public Administration (P.A.) must be characterised by maximum honesty, transparency, good faith and collaboration, whilst respecting any laws in force at the time;
- **transparency:** all information diffused by G.P.TECNICA must be complete, transparent, understandable, accurate and must respect the principles of equality and simultaneous access to the same by the public;
- **impartiality:** in relations with stakeholders and third parties in general, G.P.TECNICA LTD avoids discrimination of any kind, particularly on the basis of age, sex, health, nationality, political opinions and religious beliefs and social and personal status;
- **respect of people and equal opportunity:** G.P.TECNICA s.r.l. respects people's basic rights and ensures that everyone has equal opportunity;
- **professionalism and enhancement of human resources:** G.P.TECNICA s.r.l. recognizes the centrality of human resources and works to protect and promote its value in order to improve and increase the wealth and competitiveness of the skills possessed by each individual worker, whilst following a policy based on the recognition of merit and equal opportunities and providing for specific programs aimed at professional growth and acquisition of more skills;
- **confidentiality:** G.P.TECNICA s.r.l. guarantees the confidentiality of all information in its possession and refrains from collecting and using sensitive data, except in case of express and



informed consent of the data subject and in any case in accordance with any applicable laws;

- **conflicts of interest:** in carrying out its activities G.P.TECNICA s.r.l. strives to avoid conflicts of interest. Every decision regarding business is made by the managers in the best interests of G.P.TECNICA s.r.l.
- **safety, health and working conditions:** the moral and physical integrity of all workers and operators is considered a primary value by G.P.TECNICA s.r.l.. Safety, hygiene and health in the workplace is considered fundamental and a priority as well as the full respect of health, physical integrity and workers rights and the full respect of all laws regarding safety, hygiene and health in the workplace.
- **environment:** G.P.TECNICA s.r.l. promotes environmental respect and protection, actively engaging in ensuring full compliance with existing environmental legislation in the conduct of business activities.

### **Art. 3 - General Behavioural Rules**

**3.1** All actions, operations and negotiations carried out and, in general, the conduct of Employees and other workers whilst working in favor and / or for G.P.TECNICA LTD are therefore inspired by the utmost fairness from a management point of view, the completeness and transparency of the information, the legality formal and substantial aspects, and the clarity and truth in accounting audits in accordance with current rules and internal procedures.

**3.2** It is Corporate Exponents' (those who play the aptitude in each of the separate departments of the Company) job, to give concrete value to the values and principles contained in the Code of Ethics, taking responsibility for internal and external responsibilities and strengthening the trust, cohesion and group spirit.

**3.3** The sole administrator, in setting business strategies and objectives, in proposing investments and carrying out projects, as well as in any decision or action relating to the management of G.P.TECNICA s.r.l. shall be inspired by the principles contained in the Code of Ethics.

**3.4** The employees of G.P.TECNICA s.r.l. , in the due respect of the law and regulations in force, must adjust their actions and behaviours to the principles, goals and commitments set out in the Code of Ethics.

**3.5** For the full observance of the Code of Ethics, each Employee, if he or she becomes aware of situations that, effectively or potentially, may constitute a violation of the Code of Ethics, must promptly report to his / her Department manager or superior and / or Supervisory body.

**3.6** Each employee must provide skills and expertise adequate to the responsibilities assigned.

### **Art.4 - Supervisory Body**

**4.1** The task of supervising the operation and observance of the models as well as the task of updating them is entrusted, in accordance with article 6, paragraph 1, letter b) D. Legislative Decree 231/2001, to an entity body with autonomous powers of initiative and control;

**4.2** All of the Company's relationships with the Supervisory and Control Authorities will follow principles of legality, transparency and loyal cooperation while maintaining constant and timely information flows which will in turn ensure the timeliness, completeness and correctness of the information provided, the objectivity of the evaluations.

## **Art.5 - Staff Behavioural Rules**

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**5.1** Each employee is required to know the rules contained in the Code of Ethics and the rules of reference governing the activity carried out under his / her function. The Staff of G.P.TECNICA s.r.l. are required to:

refrain from conduct contrary to these rules;

contact superiors and / or the Supervisory Body for any clarifications on how to apply these rules;

Any worker must report promptly to his or her superior and / or to the Supervisory Body any news regarding any possible violations or requests made, be it by direct detection or reported by others.

**5.2** The Code of Ethics is an integral part of the working relationship.

Observance of the Code of Ethics must be an essential part of the obligations of the Employees of G.P.TECNICA s.r.l. in order to furthermore comply with the purposes effects of art. 2104 of the Italian Civil Code.

Violation of the Code of Ethics may constitute a breach of the primary obligations of the employment relationship and a disciplinary offence, with legal consequences, also in relation to the retention of the employment relationship and may involve requests for compensation for the damages caused by the violation itself.

## **Art. 6 - Obligations of business function managers**

Each unit or function manager (meaning any subject that exercises, even in fact, the management and / or control of a unit or division of the company) is required to:

to standardize his/her conduct with the principles set forth in the Code of Ethics and Reference

Procedures, and to demand compliance from both Employees and Partners. For the purposes of this Code of Ethics, each worker must supervise the employees and co-workers under his direction, coordination or control and take the necessary measures to prevent violations of the Code of Ethics;

ensure that Employees and Employees understand that compliance with the Code of Ethics, as well as procedures and safety rules, is an essential part of the quality of the work, and that the violation of such Code can be considered a contractual and / or disciplinary offence, in accordance with current legislation;

Carefully select, as far as their competence is concerned, internal and external collaborators to prevent assignments being given to people who are not fully reliant on their commitment to comply with the Code of Ethics and procedures;

adopt prompt corrective measures whenever necessary, and implement and promote the adoption of appropriate measures to prevent the recurrence of violations;

Promptly report to the Sole Administrator and the Supervisory Body their own reports and any reports received from his / her colleagues regarding potential or current violations of this Code of Ethics by any Employee or Partner.

## **Art.7 - Internal Behavioural Rules**

### **7.1 General Business Management**

G.P.TECNICA s.r.l. in business relations is inspired by principles of loyalty, fairness, transparency, efficiency and market opening.

Workers who act in the name of or on behalf of G.P.TECNICA s.r.l. are held, in the business relations of interest of G.P.TECNICA s.r.l .. and in relations with the Public Administration,

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to an ethical and respectful law of conduct, characterized by the utmost transparency, clarity, correctness and efficiency.

In all commercial and promotional relations, workers are required to adopt behaviour which is in line with the policies of G.P.TECNICA s.r.l., that can never be expressed, albeit aimed at the company purpose, in acts contrary to the law, current regulations or company procedures regarding individual functions.

## **7.2 Gifts and other benefits**

In relations with Customers, Suppliers and third parties in general, the direct or indirect offer or concession of money, gifts or benefits of any kind in the personal interest of any kind, whether real or apparent, of any nature or otherwise designed to acquire or to reserve preferential treatment (for example, promises of economic benefits, favours, recommendations, promises of job offers, etc.) in conducting any activity related to the Company, is strictly prohibited.

Acts of kindness are allowed, provided they are of modest value and made in compliance with any relevant legislation, and will be managed in accordance with company policies.

## **7.3 Conflict of Interest**

Workers must avoid situations and/or activities that can lead to conflicts of interest with G.P.TECNICA s.r.l. or which could interfere with their ability to make impartial decisions, in safeguarding the best interest of the company.

By way of example, and not exhaustive, there is a conflict of interest in the case of:

i) profit-sharing (overt or covert, direct or indirect) of the Administrator, members of corporate bodies of G.P.TECNICA s.r.l. Corporate Exponents and / or Employees of the Recipient in activities of Suppliers, Clients, Competitors and any other external entities seeking to establish a relationship with G.P.TECNICA s.r.l. .. ;

- exploitation of his or her functional position for the pursuit of interests in contrast to those of G.P.TECNICA s.r.l.

- using information acquired whilst working for one's self or

third parties and which conflict with the interests of G.P.TECNICA s.r.l. .. ;

- assuming social responsibilities or carrying out work activities of any kind, even indirectly, with clients, suppliers, competitors and third parties in general which clash with the interests of G.P.TECNICA s.r.l.

- hiring mediators, brokers or other professionals on behalf of third parties for operations concerning G.P.TECNICA s.r.l. or its interests.

Should the Recipient present any potential conflict with the interests of G.P.TECNICA s.r.l. the Recipient must immediately notify his or her superior and, in cases of greater relevance, the Supervisory Body and abstain from any activity related to the source of the conflict.

In the relations between G.P.TECNICA s.r.l. and third, workers must act in accordance with ethical and legal standards, with explicit prohibition of resorting to illegitimate favouritism, collusion, corruption or solicitation of personal advantages for themselves or others.

It is mandatory to report promptly to superiors and, in the most important cases, to the Supervisory Body any information that may presume or presuppose a situation of potential conflict of interest with G.P.TECNICA s.r.l. ..

This is without prejudice to the discipline in the matter of conflict of interest of members of the corporate bodies under law.

Workers must also avoid any situations and/or activities that contrast with the contents of Decree 231/2001 and similar applicable regulations.



#### **7.4 Selection and contractual relations with suppliers**

The selection of Suppliers and the formulation of the conditions of purchase of goods and services for G.P.TECNICA s.r.l. follows the values of competition, objectivity, fairness, impartiality, fairness in price, quality of goods and / or service and the panorama of offers in general.

Buying processes must be aimed at the search for the maximum competitive advantage for G.P.TECNICA s.r.l. and at the loyalty and impartiality of any Suppliers who meet the required requirements. In addition, the collaboration of the Suppliers has been pursued in ensuring constant compliance with the requirements of G.P.TECNICA s.r.l. in terms of quality and delivery times.

The stipulation of a contract with a supplier must always be based on a relationship made of extreme trust, therefore avoiding, where possible, the assumption of contractual constraints that involve forms of dependence on the Contractor Supplier. Each contract must contain a clause in which the Supplier vows to fully comply with the principles set out in the present Code of Ethics, subject to the Company's ability to resolve the report and to request compensate for any damages.

Furthermore, in order to ensure respect for all involved, G.P.TECNICA s.r.l. when choosing its suppliers (especially in countries defined as "at risk" by recognized organizations), bases its decision on criteria that guarantee workers respect of their basic rights, equal treatment and non-discrimination, as well as protection of child labour.

#### **7.5 Protection of personal data**

GPTECNICA srl., in the pursuit of its activities, in order to guarantee the protection of personal data, is committed to treating such data in compliance with the relevant regulations and in particular in accordance with the following criteria: transparency vis-à-vis subjects to whom the data refer to.

the legality and correctness of the treatment, the relevance of the treatment to the declared and pursued purposes and the security of the data processed.

Any information relating to a person identified or identifiable, even indirectly, by reference to any other information, including a personal identification number, is considered "personal data".

#### **7.6 Use of Company Assets**

Each worker is responsible for the protection and correct use of all assets belonging to G.P.TECNICA s.r.l., material or otherwise, including confidential information and computer and network resources, and has a duty to promptly inform the appropriate bodies of any threats or damaging events regarding G.P.TECNICA LTD In particular, each worker must:

work with diligence to protect business assets by behaving in a way that is responsible and in line with operational procedures designed to regulate their use;

avoid improper use of company assets for purposes contrary to law, public order or morality, as well as to commit or cause the commission of crimes and / or racial intolerance, exaltation of violence and violation of human rights;

obtain the necessary authorizations in the event of use of the property outside the company;

Avoid the unauthorized use of company assets for any purpose other than the business activity.

#### **7.7 Electronic Data**

increasing dependence on computer technology requires the availability,



security, integrity and maximum efficiency of data regarding G.P.TECNICA s.r.l. transmitted or stored electronically.

Each Recipient is therefore required to:

do not send mini clips or injurious email messages, do not use obscene or low-level language, do not make inappropriate or undesirable comments that may result in personal injury and / or damage to the corporate image and which, however, constitute a violation of the values and policies of G.P.TECNICA s.r.l. such as sexual harassment, racial hatred and other forms of discrimination, both inside and outside the company;

Avoid spamming or so called "chain mail" which can that may generate a traffic of data / information / processes within the corporate computer network such as to significantly reduce the efficiency of the network with negative impacts on productivity;

avoid visiting websites with indecent and offensive content or, more so, pornographic or otherwise unacceptable or against the law and morality;

to take the utmost care of corporate security policies in order not to compromise the functionality and protection of information systems;

avoid uploading unauthorized software onto company systems and never make unauthorized

copies of licensed software for your personal, corporate, or third party use.

## **7.8 Document traceability and integrity**

Each Recipient must keep, in compliance with company procedures, adequate documentation of each transaction carried out, in order to be able to proceed at any time to verify the motivations and characteristics of the transaction in the authorization, performance, registration and verification phases of the same.

All financial reports, accounting records, research advancement reports, sales reports, attendance sheets and any other documents relating to the activities and organization of G.P.TECNICA s.r.l. must accurately and clearly show the relevant facts and the true nature of each operation.

Any document, in any form whatsoever, whose content is incomplete, incorrect or untrue, is contrary to company policy and will therefore be considered unacceptable.

## **7.9 Travel and entertainment**

Travel and entertainment must be compatible with work requirements. It is the intention of G.P.TECNICA s.r.l. to ensure that employees and, more generally, recipients, do not obtain unjustified or unlawful benefits or suffer damages or economic loss as a result of business trips or events. They are therefore permitted to use G.P.TECNICA s.r.l. funds and manage them with the same care and caution as they would their own.

When submitting an expense report, all reasonable expenses, effective and authorized, will be reimbursed according to the rules contained in specific company procedures. You should always ask for receipts and separate your personal and work expenses in every circumstance.

## **7.10 Reserved Information**

Confidential documents and information belonging G.P.TECNICA s.r.l. .. (including projects, proposals, strategies, negotiations, agreements, commitments, agreements, contracts in progress, products not yet marketed, search results, financial projections and customer lists),

with particular reference to price sensitive information (i.e. non-public information and documents) which, if made public, are likely to have a significant impact

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on the price of any financial instruments that may have been issued or have an impact on the activities of G.P.TECNICA s.r.l., may only be disclosed in accordance with company procedures. Any confidential information obtained cannot be used for the personal benefit of the Employees or other entities associated with them or related.

## **Art.8 - External relations**

### **8.1 Political parties, trade unions and associations**

Relations with political parties, trade unions and other interest groups are bound by authorized company representatives or by persons delegated by them, in compliance with the Code of Ethics, as well as by-laws and special laws, with particular regard to principles such as impartiality and independence.

G.P.TECNICA s.r.l. does not make direct or indirect contributions to Political Parties, their representatives or candidates, and refrains from any direct or indirect pressure on political representatives (for example, by accepting recruitment reports, counselling contracts, etc.).

Every Employee must recognize that any form of involvement in political activities is carried out on a personal basis, in their own free time, at their own expense and in accordance with applicable laws.

G.P.TECNICA s.r.l. does not make direct or indirect contributions to organizations that may cause conflicts of interest (such as trade unions, consumer protection associations or environmentalists).

Strictly institutional forms of cooperation are possible when: (i) the objective is attributable to the mission of G.P.TECNICA s.r.l. or refers to projects of public interest; (ii) the allocation of resources is clear and documentable; (iii) there is an express authorization from the business departments concerned.

### **8.2 Public administration and supervisory bodies**

G.P.TECNICA s.r.l., in relations with the Public Administration, operates under the following principles:

It adapts its conduct to the utmost transparency, clarity, fairness and impartiality such as not to induce partial, distorted, ambiguous or misleading interpretations to any public institutional entity with whom various relationships have been established;

It prohibits direct or indirect contributions, in any form whatsoever, does not provide funding for any public entities, except for those permitted and provided for by applicable laws and regulations;

Relations with P.A., Italian or foreign, for negotiations or other contacts of any kind of activity deemed instrumental to the company, are managed only by those who have been formally assigned to it;

condemns any behaviour of the Recipients, consisting in promising or offering, directly or indirectly, money or other services to Public Officers and / or

Public Service Officers in Italy or abroad, from which he or she may obtain, from G.P.TECNICA s.r.l., interest or advantage;

prohibits the promise and / or the offer of any object, service, or value offering in order to obtain more favourable treatment regarding any relationship with P.A., Italian or foreign;

prohibits the promise and / or the offer of any object, service, or value offering aimed at inducing Public Officials / Public Service Officers, Italian or foreign, into using their

influence on other subjects belonging to Italian or foreign P.A.;

the offer of any object, service, performance or favor to Public Officials / Public Service Officers, Italian or foreign, or their relatives within the second degree, either directly or through an intermediary, except in the case of gifts of modest value which, in any case, fall within legitimate uses or customs;

prohibits the establishment of employment relationships with employees of P.A. or the recruitment of ex- employees of P.A., Italian or foreign, or their relatives within the second degree, who are participating or have personally and actively participated in business negotiations or adduced requests made by G.P.TECNICA s.r.l. to P.A. Italian or foreign;

prohibits the use for purposes other than those for which grants or loans received by the State or other public entity or by the European Communities have been granted, even if they are of modest value and / or amount;

Condemns any conduct aimed at obtaining, from the State, the European Community or any other public entity, any type of contribution, funding, loan or other disbursement of the same type, by means of statements and / or altered or falsified documents, or by means of omitted information or, more generally, by means of artifice or deception, including those made through computer or electronic systems, aimed at misleading the service provider;

Is committed to fully and strictly observing the rules established by regulatory authorities, such as the Bank of Italy, Consob (National Commission for Societies and the Stock Exchange), ISVAP (Institute for Supervision of Private Insurance), COVIP (on funds Regulatory Pension Commissions), AGCM (Competition and Market Authority) and control bodies, as well as engaging in their relations with the aforementioned bodies to the utmost collaboration in full respect of their institutional role by committing themselves to the speedy implementation of all requirements applicable to G.P.TECNICA s.r.l.

### **8.3 Relationships with mass media**

Communication with the media plays an important role in the enhancement of the image of G.P.TECNICA s.r.l.. Therefore, relations between G.P.TECNICA s.r.l. and the mass media are only for the specially designated business functions, and must be carried out in accordance with the policy and communication tools defined by the corporate bodies, as well as with the laws, rules and practices of professional conduct.

Any information given to the entities outside the company is inspired by criteria of truthfulness and transparency. It is absolutely forbidden to divulge false news.

Generally, the Employees of G.P.TECNICA s.r.l. aren't allowed to provide information to mass media representatives or undertake to provide information without obtaining authorization beforehand.

### **8.4 Clients**

G.P.TECNICA s.r.l.'s main objective is to fully satisfy its clients, through trustworthy and fair behaviour, which in turn guarantees high quality products and services.

G.P.TECNICA s.r.l. sets contracts and relationships with customers in a correct, complete and transparent manner, in compliance with the law (with regards to anti-money laundering, personal data protection, transparency and anti-wear rules), regulations, the Code and internal procedures.

Even where unforeseen events or situations occur, G.P.TECNICA s.r.l. respects the customer's expectations and carries out contracts fairly, without exploiting any conditions of weakness or ignorance when unforeseen events arise.

Workers are prohibited from engaging in business relationships with current or potential customers who are known or suspected of involvement in illicit activities, and their ability to fulfil their payment commitments should also be taken into account

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when assessing a potential client.

When dealing with customers, workers must not offer or accept gifts or other forms of benefits and / or utilities that can be interpreted as a means of obtaining favourable treatment for any activity that can be linked to G.P.TECNICA s.r.l. and which are not attributable to normal business relations or courtesy.

## **Art. 9 - Staff Politics**

**9.1** Human resources are an indispensable element of the company's existence. The dedication and professionalism of the Employees are values and conditions that determine the success of the company itself.

### **9.2 Hiring**

The Company focuses on the search and selection of personnel using criteria such as objectivity, competence and professionalism, while respecting the principle of equal opportunities, pursuing the exclusive goal of acquiring employees with great capabilities and morality.

### **9.3 Training**

Consistent with its objective of using high-quality employees and enhancing their professional growth, the company promotes business plans and appropriate training programs so that the skills, energy and creativity of such individuals is fully expressed in the achievement of company objectives.

Conversely, every employee must commit to developing their skills and professionalism and participate in training initiatives organized by the Company in order to acquire an appropriate level of legislative knowledge.

### **9.4 Evaluation**

Staff evaluation is carried out based on meritocratic criteria ensuring each worker equal opportunity as well as the same opportunities for professional growth and treatment, characterized by fairness, honesty and loyalty, by each Manager.

The "competent functions", meaning all Staff Managers and Sector Managers, must: Adopt individual merit, competency, and capacity and potential evaluation criteria, which must then be used in a strictly professional manner in any decision regarding an employee;

select, hire, train, pay and manage employees without any discrimination;

preserve the work environment so that personal characteristics do not give rise to discrimination.

Each worker must actively collaborate in order to maintain a climate of mutual respect for each other's dignity and reputation.

G.P.TECNICA s.r.l. therefore opposes any discriminatory or injurious behaviour or attitude of the person, his or her beliefs and preferences, put in place by any

Employee or Company Exponent in relation to his or her superior, or subordinate colleagues.

The Staff Manager must be immediately notified of any breach of the dispositions contained in the present article.

### **9.5 Sexual Harassment**

G.P.TECNICA s.r.l. does not tolerate sexual harassment, meaning as such: the subordination of pay or career in exchange for sexual favours; proposals of

private interpersonal relations, made despite of express or reasonably obvious disapproval, which have the ability, in relation to the specificity of the situation, to disturb the serenity of the recipient.

#### 9.6 Abuse of alcohol and drugs

G.P.TECNICA s.r.l. requests that each employee personally contribute to maintaining a respectful work environment for others. The following will therefore be considered unlawful conduct: working under the effects of alcohol, drugs or substances with similar effects; consumption or disposal of narcotic and / or alcoholic substances during any work experience.

#### *9.7 Smoking*

G.P.TECNICA s.r.l. given the willingness to create a healthy and comfortable environment for both its employees and visitors, has banned smoking in the workplace.

#### *9.8 Prohibition of discrimination*

In the conduct of business of G.P.TECNICA LTD Employees must respect the dignity, rights and cultural differences of individuals. G.P.TECNICA s.r.l.'s policy does not discriminate Employees and follows the principle of equal employment opportunities without distinction of any age, gender, race, religion, colour, physical handicap, citizenship, civil status or sexual orientation. No form of mobbing will be tolerated.

### **Art. 10. Environment and Safety**

G.P.TECNICA s.r.l. is committed to spreading and consolidating a culture of safety by developing risk awareness and promoting responsible behaviour to all its employees and working to preserve, using preventative actions, the health and safety of its workers.

The activities of G.P.TECNICA s.r.l. must be carried out in full compliance with existing legislation regarding prevention and protection; the operational management should be based on advanced criteria of environmental protection and energy efficiency, pursuing the improvement of health and safety in the workplace. G.P.TECNICA s.r.l. is also committed to ensuring the protection of working conditions in order to safeguard the psycho-physical integrity of the worker, whilst respecting his moral personality and preventing any illicit conditioning or undue inconvenience.

In particular, the fundamental principles and criteria according to which decisions of all kinds and at all levels are taken in the field of health and safety at work can thus be identified:

- a) avoid risks;
- b) evaluate all risks that cannot be avoided;
- c) fight the risks at the source;
- d) adapt the work to the worker, with particular regard to the layout of workspace and the choice of work equipment and the working and production methods, in particular to mitigate monotonous work and repetitive work and to reduce the effects of these jobs on the workers' health;
- e) take into account the degree of evolution of the technique;
- f) replace what is dangerous with what is safe or in any case less dangerous;
- g) plan prevention, aiming at a coherent complex that integrates technique, work organization, working conditions, social relationships and the influence of factors affecting the working environment;
- h) give priority to collective protection measures rather than individual protection measures;
- i) impart appropriate instructions to the workers.

These principles are used by G.P.TECNICA s.r.l. to take the necessary measures to protect the safety and health of its workers, including the prevention of occupational risks, information and training, as well as providing the necessary organization and means.

The whole company, at both the apex and the operating levels, must adhere to these principles,



especially when decisions or choices have to be made, and then again when they are implemented.

## **Art. 11 - Transparency of accounting information and internal controls**

### **11.1 Transparency of accounts**

G.P.TECNICA s.r.l. is aware of the importance of truth, transparency, accuracy, completeness and regulatory compliance of accounting information.

For this purpose, the company provides administrative and accounting systems that are appropriate for representing management facts and provides the tools for identifying, preventing and managing, as much as possible, financial and operational risks as well as fraud against G.P.TECNICA s.r.l..

In particular:

All activities and actions carried out by the workers during the course of their work must be verifiable;

accounting transparency is based on the truth, accuracy, completeness and reliability of the documentation regarding management facts and the relative accounting records; each Recipient shall cooperate to ensure that operating events are represented correctly and promptly in the accounts;

For each operation, adequate documentation of the activity carried out is kept for the records so that it is easy to register, identify the different levels of responsibility and accurately reconstruct the transaction;

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

Workers who become aware of omissions, falsifications, alterations, incompleteness or negligence of the information and supporting documentation are required to report the facts to their superior and to the Supervisory Body.

### **11.2 Internal Control System**

G.P.TECNICA s.r.l. considers it important to form, throughout all levels of its staff, a culture conscious of the importance of an efficient internal control system, understood as a process carried out by the Company Exponents which is aimed at facilitating the realization of business objectives, safeguarding resources, preventing corporate risks, ensuring compliance with applicable laws and regulations, and providing reliable, truthful and accurate financial statements and data.

In particular G.P.TECNICA s.r.l. believes that the internal control system should promote the achievement of business goals and should therefore be geared to improving the efficiency and efficiency of production and management processes.

All Workers, within the functions performed, are responsible for the proper functioning of the control system.

## **Art. 12 - Reference bodies for the application of the Code of Ethics**

The reference bodies for the application of the Code of Ethics are:

The Supervisory Body of G.P.TECNICA s.r.l. according to D. Lgs. 231 / 2001, has the task of investigating reports of possible violations and initiating investigations and inquiries, using the competent structures of G.P.TECNICA LTD

Consequently, it will have the task of evaluating and communicating to the relevant corporate bodies the nature and severity of the breach and the results of the audits of the corrective actions to be taken. The Supervisory Board also provides

a reference point for interpretation of aspects related to the Code of Ethics;  
The Personnel Management Function of G.P.TECNICA s.r.l. has the task of promoting the knowledge of the Code within G.P.TECNICA s.r.l. .. and taking - in coordination with the Supervisory Body - the appropriate sanctioning measures in case of violations of the Code of Ethics.

The Code of Ethics does not replace current and future business procedures that continue to be effective insofar as they are not in conflict with the Code of Ethics.