



Code of Conduct

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COMPANY CODE OF CONDUCT

The Code of Conduct is an essential instrument with which the company intends to give instructions and suggestions so that all its personnel work in accordance to an ethical behaviour summed up in the following objectives:

- respect the national laws in force;
- work correctly and with courtesy in relating with colleagues giving the upmost collaboration;
- respect the interest of every interlocutor, (clients, institutions, public authorities and the external community);
- carry out ones role, professionally and with moral integrity respecting human dignity.

In addition, the code defines the modalities to check the actual observance of the operative procedures and of the foreseen sanctions in case the personnel violate the “Ethical and behavioural Code”

PEOPLE TO WHOM THE CODE APPLIES

The code applies, without exception, to all the members of the Company, from the Employer to the members of administration, working unions, collaborators, consultants and all the personnel of the company; furthermore any other third subject which may act on behalf of or appointed by the company All the mentioned subjects must understand and respect the contents.

CONFLICT OF INTERESTS

In carrying out ones job, each employee must avoid any possible conflict of interest, with particular reference to personal interests and/or family interests, which could affect independence of personal judgement and contrast with personal responsibilities.

Each worker must immediately inform their hierarchical superior and/or company management about any situation which is or may generate any conflict of interest. In particular, must report any stable or temporary work, or a financial, commercial, professional, family, relationships with external entities which could influence impartiality of personal conduct or compromise correctness of the carried out activities.

PROTECTION OF COMPANY'S PROPERTY

Each worker must work with diligence to protect the company's property, in a correct and responsible manner, the entrusted instruments avoiding improper use.

Each worker must work, respecting the rule of state of art for attention and maintenance.

In reference to the use of informatic tools, each worker must not compromise the functionality and protection of the tools to them entrusted.

In short it is prohibited to:

- use the available tools (software, e-mail, internet, telephone, ecc.), for reasons different from those connected to working needs;
- download or install unathourized programes and softwares, differnt from those supplied by the company;
- send insulting e-mails which could offend the person or damage the image of the company;
- surf internet sites with offence and indecorous content;
- Use company tools for personal extra-work activities.

PROTECTION OF INTELLECTUAL PROPERTY

Company information of any nature (commercial, financial, technical, ecc...), represent a resource which the company intends to protect, considered as know-how assets and technical investments. It is therefore prohibited to disclose to unauthorized people (in or out of the company) any information which could risk the professional commercial assets acquired in time. The company intends to apply the provisions in force.

PROTECTION OF INFORMATION SECURITY AND DATA PROTECTION

The Company aims to fulfill contractual requirements undertaken with its customers in the field of information security and in compliance with the most up-to-date European and national privacy regulations, it has adopted an Information Security Management System (ISMS) for information security management as well as the Organizational Model and Data Protection Management (GDPR). All personnel are subject to the policies / procedures contained therein and declares, by signing this code of ethics, that they fully accept all the provisions / prescriptions.

PROTECTION OF MORAL AND PHYSICAL INTEGRITY

All the company personnel, whose physical and moral integrity is considered a primary value for the company, are guaranteed respectful working conditions of individual dignity, in a safe and healthy working environment. In particular, the company will not tolerate:

- Power abuse: by position abuse we mean, requesting the performance and personal favours as an act due to the hierarchical superior, or taking on attitudes and / or carrying out actions that are detrimental to human dignity and above all to the autonomy of the collaborator;
- acts of psychological violence: discriminatory or harmful attitudes or behaviour towards the person and his convictions;
- sexual harassment: behaviour or speeches that may upset the the operator's sensitivity
- bullying: that can seriously compromise the health of the worker on the job site;
- operational mobbing: which can lead to psychological situations with serious consequences in the operative activity of the employee.

RESPECTING THE ETHIC AND BEHAVIOUR CODE

Observance of the rules of this Code must be considered an essential part of the contractual obligations of the employees and of all the recipients to whom it applies.

In particular, it must also be considered an essential part of the contractual obligations undertaken by the governance bodies, by collaborators including subordinates and / or subjects having business relations with the Company.

The Company is responsible for ensuring that its expectations of conduct towards the recipients are by them understood and put into practice.

In order to ensure the effective application of the code, the Company requires the personnel to report any cases of non-compliance with this Code.

Employees and collaborators must report any violations or suspected violations to the Direct Manager, the Personnel Manager and / or the President in office of the Company.

The Supervisory Body that is activated by the President is represented by the Board of Directors, the Personnel Manager and the Direct Responsible of the person under investigation.

The Supervisory Body verifies the validity of the report, verifies the information transmitted with due care both for the possible application of disciplinary sanctions and for the activation of contractual resolution mechanisms. The Supervisory Body also ensures that no one in the workplace can be subjected to retaliation, unlawful conditioning, inconvenience or discrimination, for having reported the violation of the contents of the Code of Ethics of behaviour or internal procedures.

Any form of retaliation against those who have made good faith reports of possible violations of the code is also a violation of the Code.

Furthermore, the behaviour of those accusing other employees of violation, with the knowledge that such violation does not exist, must be considered as a violation of the Code.

SANCTIONS

Violation of the principles established in the Code of Ethics and Conduct and in company procedures compromises the relationship of trust between the Company and anyone who commits the violation (administrators, collaborators, consultants, company personnel, customers, suppliers).

Violations, once ascertained, will be promptly and immediately prosecuted, through the adoption, compatibly with the provisions of the current regulatory framework, of adequate and proportionate disciplinary measures, regardless the possible criminal relevance of such conduct and the establishment of criminal proceedings in cases where they constitute a crime.

In the case of violations by the directors, the report will be addressed to the board of directors and to the shareholders' meeting for the appropriate measures.

In the event of violations by suppliers and contractors, penalties and, in the most serious cases, termination of the relationship will be applied, under the terms provided for in the contracts.

In the case of violations by employees, the disciplinary measures for violations of this Code are adopted by the Company in line with the laws in force and with the related national labour contracts.

These measures may also include removal from the Company of those responsible for such illegal conduct. The Company, in order to protect its image and safeguard its resources, will not have relationships of any kind with individuals who do not intend to operate in strict compliance with the current legislation, and / or who refuse to behave according to the values and principles set forth in the Code of Ethics and of Behavior.

The Company wants to institute specific disciplinary measures so that abnormal situations are not created on the job such as to create discrepancies in a homogeneous management of behaviour and procedures.

More precisely, the company introduces as disciplinary measures:

- verbal reprimand;
- written reprimand;
- fine not exceeding three hours of hourly pay calculated on the minimum table;
- suspension from work and pay up to a maximum of three days;
- dismissal for misconduct pursuant to Article 10.

More precisely, the employer has the right to apply conservative sanctions, according to the criteria of gravity and proportionality, when the employee:

- performs the work entrusted to him negligently or with deliberate slowness;
- leaves the workplace without a justified reason;
- is absent from work without justifying the absence;
- is in a state of drunkenness at the beginning and / or during work;
- carries out his own minor works or on behalf of third parties within the company' s workshop;
- outside the company performs, on behalf of third parties, works pertaining to the company itself;
- in any way breaches the provisions of this Code or commits shortcomings that affect the discipline on the job site.

The Company also informs that it can proceed with the dismissal of the employee for serious cases made by the worker thus resulting in:

- severe insubordination or offenses against superiors or colleagues;
- theft of materials or equipment;
- stealing of drawings, projects or other business documents;
- voluntary damage to material and equipment;
- fights against or seriously offends workmates in the workplace;
- outside the company, performs personal or for third parties work;
- carries out personal or on behalf of third parties work within the company workshop;
- relapse in any of the failures that gave rise to two suspensions.

DISCLOSURE OF THE CODE OF ETHICS AND BEHAVIOUR

This "Code" issued by the Company is brought to the attention of the company personnel and of any other third party that may act on behalf of the company. All the aforementioned subjects are required to learn and respect its contents.

All members of the Company will receive a copy of the "Code" to view, acknowledge and accept its contents. A copy of the "Code of Business Conduct" must be displayed on every corporate bulletin board.

Cassino, ____ / ____ / _____

CIEM S.p.A.
