



ETHICAL CODE

TEKNOICE s.r.l.

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1. INTRODUCTION

1.1 The purposes and recipients

This Code of Ethics is a public declaration of TEKNOICE S.r.l. (hereinafter also "company" or "company") in which the general principles and rules of conduct are identified which are recognized as having a positive ethical value. As an element of application of the provisions of Article 6 of Legislative Decree 8 June 2001 no. 231, the Code of Ethics integrates the regulatory framework to which TEKNOICE S.r.l. is submitted. In fact, with the adoption of the Code of Ethics, an essential core of values and principles, already inherent in corporate actions, have been defined as fundamental norms of daily activity.

The Code of Ethics of TEKNOICE S.r.l. is an official document, approved by the Board of Directors, which expresses the commitments and ethical responsibilities, pursued and implemented in carrying out all the activities aimed at achieving the corporate objectives - in compliance with all stakeholders - by the directors, auditors, employees, collaborators, suppliers, consultants and commercial partners (agents, resellers and the like) of TEKNOICE S.r.l. .

This Code is intended to ethically guide the actions of the company and its provisions are consequently binding for the conduct of all the directors of the company, its managers, employees, consultants and anyone who establishes, for any reason, a relationship. in collaboration with TEKNOICE S.r.l. .

The Code is widely distributed internally by posting in a place accessible to all, published and downloadable from the company website and made available to any interlocutor of the company.

The company also undertakes to call for compliance with the provisions of this Code in all economic relations established by it.

1.2 The mission of TEKNOICE S.r.l.

The mission that TEKNOICE S.r.l. aims is to: "Be an active and responsible component of the community in which it operates, offering quality, commitment and orientation to the achievement of objectives in the plurality of activities it carries out, aiming to become a center of excellence in the production of ice cream machines and supply of solutions for all types of industrial and semi-industrial ice cream producers ".

1.3 The relationship with stakeholders

The Code intends, in particular, to direct the conduct of the company towards cooperation and trust in the stakeholders, i.e. those categories of individuals, groups and institutions whose contribution is necessary for the realization of the company mission and / or whose interests are directly or indirectly influenced by the activity of TEKNOICE S.r.l. .

1.4 Value of corporate reputation and credibility

Reputation and credibility are fundamental intangible assets. The good reputation and corporate credibility favor investments, relationships with local institutions, customer loyalty, the development of human resources, fairness and reliability of suppliers.

In carrying out any business activity, non-ethical behavior compromises the relationship of trust between the company and its stakeholders. To this end, they are unethical and, on the contrary, favor the establishment of hostile and non-transparent behavior towards TEKNOICE S.r.l., the conduct and attitudes of anyone, individual or organization, belonging to or in an external collaboration relationship with the company try to procure an undue advantage or interest for yourself, for TEKNOICE S.r.l. .

By unethical behavior we mean both those that violate legal regulations and those that are in contrast with internal regulations and procedures.

1.5 Contents of the Code of Ethics

The Code of Ethics consists of:

- The general ethical principles that identify the reference values in company activities;
- The criteria of conduct towards each *stakeholder*, which provide the guidelines and rules which the recipients of the Code are required to abide by;
- The implementation mechanisms that outline the control system for the correct application of the Code of Ethics and for its continuous improvement.

1.6 Contractual value of the Code

Compliance with the rules of the Code must be considered an essential part of the contractual obligations of the company's employees pursuant to and for the purposes of articles 2104, 2105 and 2106 of the Civil Code.

The serious and persistent violation of the rules of this Code damages the relationship of trust established with the company and can lead to disciplinary actions and compensation for damage, without prejudice to the compliance with the procedures provided for by art. 7 of Law 300/1970 (Workers' Statute) and collective bargaining agreements.

1.7. Code updates

By resolution of the Board of Directors, the Code can be modified and integrated, also on the basis of suggestions and indications from the Supervisory Body.

2. GENERAL PRINCIPLES

The Code of Ethics represents a set of principles and guidelines whose observance is of fundamental importance in order to achieve the corporate objectives, the regular performance of the activities, the reliability of the management and the image of TEKNOICE S.r.l. .. The activities, conduct and relationships both internal and external to the company are inspired by these principles and guidelines.

2.1. Responsibility

In carrying out the corporate mission, the behavior of all recipients of this Code must be inspired by the ethics of responsibility. The essential principle of the company is compliance with the laws and regulations in force in Italy and in all other countries in which it operates. The recipients of the Code are required to comply with current legislation; in no case is it allowed to pursue or realize the interest of the company in violation of the laws.

TEKNOICE S.r.l. undertakes to ensure an adequate information and ongoing training program on the Code of Ethics for interested parties.

2.2. Transparency

The principle of transparency is based on the truthfulness, accuracy and completeness and sharing of information both inside and outside the company. In the formulation of contracts with its Customers and Suppliers, the company elaborates the clauses in a clear and understandable way, always ensuring that the condition of equality is maintained.

2.3. Correctness

The principle of fairness implies respect for the rights, also in terms of privacy and opportunities, of all subjects who are involved in work and professional activities.

This also requires the elimination of any discrimination and any possible conflict of interest between employees and the company.

External relations, relations with one's own collaborators and those between the latter, must be based on the utmost loyalty, in acting with a sense of responsibility, in the enhancement and protection of company assets and in the application of an attitude of good faith in any business or decision.

TEKNOICE S.r.l. therefore undertakes to act fairly and impartially, adopting the same behavior towards all interlocutors with whom it comes into contact, even in the different forms of relationship and communication required by the nature and institutional role of the various interlocutors.

2.4. The efficiency

The principle of efficiency requires that in every work activity the cost-effectiveness of the management of the resources used in the performance of business processes is achieved and the commitment is made to offer adequate services with respect to the needs of customers and according to the most advanced standards.

TEKNOICE S.r.l. undertakes to constantly guarantee the effectiveness and efficiency of business processes, through the preparation and compliance with programs for the continuous improvement of the quality of the services provided through the adoption of technological and organizational solutions aimed at combining the satisfaction of the needs of its Customers with the efficiency and cost-effectiveness of management.

2.5. The spirit of service

The principle of the spirit of service implies that each recipient of the Code is always oriented, in their behavior, towards collaboration and sharing of the corporate mission.

2.6. Competition

The company complies with and applies the laws and competition rules in force in the European Union and in the countries in which the Company operates and ensures to the market, investors and the community in general, compliance with competition principles and full transparency of the own action. Free competition is a fundamental component of the market economy and promotes efficiency, economic development and innovation.

TEKNOICE S.r.l. XXXX undertakes to promote fair competition, functional to its own interests as well as to those of all market operators, customers and investors in general.

All agreements restricting competition, or any other form of conscious coordination aimed at preventing, restricting or distorting competition, as well as the adoption of commercial strategies that lead to an abuse of one's position, as an economic condition that allows the company to operate, are prohibited. effective market hegemony and hinder free competition.

2.7. Relations with the community and environmental protection

TEKNOICE S.r.l. in carrying out its business it is committed to safeguarding the surrounding environment and contributing to the sustainable development of the area. TEKNOICE S.r.l., sensitive to the issues of sustainable development and environmental protection, considers among its primary objectives the

commitment to research and continuous improvement of production processes in compliance with current legislation, environmental needs and common interest by applying the best technologies available. economically feasible in order to minimize the direct and indirect environmental impact.

In this regard TEKNOICE S.r.l. has long since adopted a Quality System certified by TUV Italia s.r.l. compliant with the requirements of the reference standard UNI EN ISO 9001.

In order to implement a concrete environmental policy, TEKNOICE S.r.l. provides to raise awareness among management and collaborators and to promote initiatives, actions and improvement programs for widespread environmental protection, to take care of the updating of staff and company operating procedures.

2.8. Enhancement of human resources

Human resources are a fundamental factor for the development of the company. Therefore, TEKNOICE S.r.l. it protects and promotes their professional growth in order to increase the wealth of skills possessed.

3. COMPANY'S GOVERNANCE SYSTEM

The governance system adopted by the company complies with current legislation and is in line with the most authoritative guidelines and best practices in the field; it is aimed at ensuring the maximum and most balanced collaboration between its members through a harmonious reconciliation of the various management, direction and control roles. At present, the governance system of TEKNOICE S.r.l. is made up as follows:

- Shareholders' Meeting;
- Board of Directors;
- President and CEO;
- Board of Statutory Auditors;
- Auditing firm.

This system is aimed at guaranteeing responsible management of the company and transparent towards the market, with a view to creating value for the shareholders and pursuing the company objectives.

The members of the corporate bodies must conform their activities to the principles of fairness and integrity, refraining from acting in situations of conflict of interest in the context of their activities within the company.

The members of the bodies are also required to behave inspired by the principles of autonomy, independence and respect for the guidelines that TEKNOICE S.r.l. provides in the relations they maintain, on its behalf, with public institutions and with any private entity.

Their assiduous and informed participation in the company's activities is required; they are required to make confidential use of the information they become aware of for office reasons and cannot use their position to obtain gifts and personal benefits, direct or indirect; all communication activities must comply with the laws and practices of correct conduct and must be aimed at safeguarding information covered by confidentiality.

The Administrative Body fulfills its functions with professionalism, autonomy, independence and with a sense of duty and responsibility towards the company, the property and third parties.

The Administrative Body must be aware of its role, its responsibilities and the role of example performed in relation to other subjects operating in the company.

The directors must not prevent or hinder the exercise of control activities by the bodies in charge, and, in addition to their own competences, they must ensure that the values set out in the Code of Ethics are scrupulously respected, promoting their sharing and dissemination also in against third parties.

The obligations of loyalty and confidentiality are binding even after the termination of the relationship with the company.

TEKNOICE S.r.l. adopts, based on the activities and organizational complexity, a system of delegation of powers and functions which provides, in explicit and specific terms, for the assignment of tasks to persons with suitable skills and competence.

4. INTERNAL CONTROL SYSTEM

In compliance with current legislation and with a view to planning and managing company activities aimed at efficiency, fairness, transparency and quality, TEKNOICE S.r.l. adopts organizational and management measures suitable to prevent illegal behavior or in any case contrary to the rules of this Code by any person acting for the company.

In relation to the extension of the delegated powers, the company implements models of organization, management and control that envisage suitable measures to ensure the performance of activities in compliance with the law and the rules of conduct of this Code, to discover and promptly eliminate situations of risk.

A special Supervisory Body is established for the verification and application of the rules contained in this Code. The Supervisory Body assists the Board of Directors in setting and updating the guidelines of the internal control system, in assessing the adequacy and effective functioning of the same and in analyzing company risks and carries out the additional tasks subsequently indicated in this Code.

The organization models, in order to prevent the risk of committing the crimes from which the liability of the company may derive pursuant to Legislative Decree 231/2001, provide that:

- a) all company activities attributable to the main processes and support processes are identified as activities in the context of which crimes may be committed;
- b) the responsibilities relating to implementation and related control are defined;
- c) reports, any violations, results of checks are reported to the Supervisory Body.

The Supervisory Body periodically checks the adequacy and effective functioning of the internal control system and carries out the interventions deemed necessary and appropriate to ensure its best functioning. This system makes use of a control activity carried out by the individual functions with respect to the procedures and activities of their own competence and the activity of the Supervisory Body within the scope of the specific competences.

5. RELATIONS WITH SHAREHOLDERS

TEKNOICE S.r.l., aware of the importance of the role played by the shareholder, undertakes to provide accurate, truthful and timely information and to improve the conditions of its participation, within the scope of its prerogatives, in corporate decisions.

It is the company's commitment to protect and increase the value of its business, in the face of the commitment made by the shareholders with their investments, through the enhancement of management, the pursuit of high standards in productive uses and the solidity of assets. The company also undertakes to safeguard and safeguard company resources and assets.

In particular, the company undertakes to ensure the regular participation of the directors in the meeting proceedings as well as to guarantee the orderly and functional conduct of the shareholders' meetings, in compliance with the fundamental right of each shareholder to request clarifications on the various topics under discussion and to express their opinion. opinion.

6. RELATIONS WITH THE STAFF

6.1. Relations with staff

TEKNOICE S.r.l. recognizes the value of human resources, respect for the individuality of workers and the importance of their contribution to the business.

The company ensures compliance with the collective labor agreements and the social security, insurance and welfare regulations of the sector. The management of the employment relationship is aimed at encouraging the professional growth and skills of each employee.

Any racial discrimination, sex, nationality, religion, language, trade union or politics, in hiring, salary, promotions or dismissal as well as any form of favoritism is prohibited.

6.2. Health and safety

The company is committed to protecting the moral and physical integrity of employees, consultants and customers. To this end, it promotes responsible and safe behavior and adopts all safety measures required by technological evolution to ensure a safe and healthy working environment, in full compliance with current legislation on prevention and protection.

6.3. Protection of the person

TEKNOICE S.r.l. undertakes to ensure compliance with the conditions necessary for the existence of a collaborative work environment that is not hostile and free of any discriminatory behavior regarding race, religion, sex, political and trade union opinions, sexual inclinations, age, origin, handicap or other factors , which have nothing to do with the work performance of the staff.

The company requires everyone's collaboration in order to maintain a climate of respect for the dignity, honor and reputation of each one. Harassment of any kind, including sexual harassment, is not permitted in business relationships.

Other prohibited behaviors as they would have a negative impact on the work environment are, by way of example and not limited to the following:

- Threats
- Violent behavior
- Possession of weapons of any kind
- Use of recorders, including video phones or cameras, for purposes other than those approved by function managers
- Use, distribution, sale or possession of drugs or other narcotic substances, which must not be taken for medical reasons.

Furthermore, the worker must not remain in the premises of TEKNOICE S.r.l. or in a working environment of TEKNOICE S.r.l. if you are under the influence of alcoholic beverages or drugs or other narcotic substances taken not for medical use.

TEKNOICE S.r.l. does not tolerate any intimidating or discriminating attitude and will take appropriate disciplinary measures against those who adopt such attitudes or abuse their position of authority within the company.

Employees who believe they have suffered discrimination can report the incident to the appropriate Supervisory Body.

Department managers who should "have news" or "suspect" the violation of the rules of this Code, must report "promptly" to the Supervisory Body.

The managers must also be vigilant to prevent any type of retaliation against anyone who provides information regarding the violation of ethical rules and / or internal procedures or collaborators in the investigations carried out for this purpose.

6.4. Personnel selection

Without prejudice to the obligations deriving from the provisions in force, the selection of personnel is subject to verification of the full compliance of the candidates with a substantial adherence to the professional profiles required by the company, in compliance with equal opportunities for all interested parties.

6.5. Hiring

The recruitment of staff takes place on the basis of regular employment contracts, as no form of employment relationship that is not compliant or otherwise elusive with the provisions in force is allowed.

6.6. Duties of the staff

Personnel must undertake to comply with the obligations set out in this Code, comply, in carrying out their duties, with compliance with the law and base their conduct on the principles of integrity, correctness, fidelity and good faith.

Personnel who "have news" or "suspect" the violation of the rules of this Code, must report in the first instance to their manager, in his absence or if the report is not respected, directly (verbally or in writing) to the Supervisory Board.

6.7. Additional duties. Accounting records and records

Those who are entrusted with the task of keeping accounting records are required to carry out each registration in an accurate, complete, truthful and transparent manner and to allow any checks by persons, including external ones, in charge of this.

Accounting records must be based on accurate and verifiable information and must fully comply with internal accounting procedures.

Each entry must allow the relative operation to be reconstructed and must be accompanied by adequate documentation.

All actions relating to company activity must result from adequate records that allow for checks and controls to be carried out on the decision, authorization and execution process. Anyone who becomes aware of any omissions, errors or falsifications is required to notify the appropriate Supervisory Body.

6.8. Conflict of interest

The employee must maintain a position of autonomy and integrity in order to avoid making decisions or carrying out activities in situations, even if only apparent, of conflict of interest with respect to the company's business.

Any activity that conflicts with the proper fulfillment of one's duties or that could harm the interests and image of the company must be avoided.

Any situation of conflict of interest, real or potential, must be notified in advance to the Supervisory Body.

6.9. Corporate assets

The employee uses and carefully guards the assets at his disposal for office reasons. The different use of company-owned assets and resources is not allowed.

Each employee is directly and personally responsible for the protection and legitimate use of the assets and resources entrusted to him for the performance of his duties.

TEKNOICE S.r.l., in compliance with the laws in force, adopts the necessary measures in order to prevent distorted use of the same.

6.10. Use of computer systems

With respect to the use of computer systems, each employee is responsible for the safety of the systems used and is subject to the regulatory provisions in force and the conditions of the license agreements. Except as provided for by civil and criminal laws, the use of network connections for purposes other than those inherent to the employment relationship or to send offensive messages or messages that may damage the image is part of the improper use of company assets and resources. of the company.

Each employee is also required to make the necessary commitment in order to prevent the possible commission of crimes through the use of IT tools.

6.11. Gifts, giveaways and other benefits

Recipients are prohibited from offering, providing, promising or granting to third parties, directly or indirectly, even on occasions of holidays, gifts, benefits or other utilities, even in the form of sums of money, goods or services.

In particular, only gifts of modest value directly attributable to normal courtesy relations are allowed. In the case of gifts granted to subjects belonging to the Public Administration, it must be previously verified that these fall within the limits allowed by the Codes of Conduct, by the rules and regulations in force for Public Employees.

The aforementioned gifts, however, must be such as to not be able to generate - in the other party, or in a third party that is foreign and impartial - the impression that they are aimed at acquiring or granting undue advantages, or such as to generate the impression of lawlessness or immorality. In any case, such gifts must always be adequately documented.

Any recipient who, in the context of their duties, enters into contracts with third parties must ensure that such contracts do not include or involve donations in violation of this Code of Ethics.

6.12. Privacy protection

The company protects the privacy of employees, in accordance with the regulations in force on the subject, undertaking not to communicate or disseminate, without prejudice to legal obligations, the related personal data without the prior consent of the interested party.

The acquisition, processing and storage of such information takes place within specific procedures aimed at preventing unauthorized persons from becoming aware of it and ensuring that all the rules for the protection of privacy are fully respected.

6.13. Confidentiality and information management

Each employee is required to keep the information learned in the performance of their duties confidential in accordance with the laws, regulations and circumstances. Each employee must observe this duty of confidentiality even after the termination of the employment relationship, striving to ensure compliance with the requirements of the current privacy regulations. He must also carefully guard the acts entrusted to him.

6.14. Information obligations

All employees are required to promptly and confidentially report to the direct Manager any news they become aware of in the performance of their work activities, regarding violations of legal regulations, the Code of Ethics or other company provisions that may, for any reason, involve society.

The Managers must supervise the work of the assigned collaborators and must inform the Supervisory Body of any possible violation of the aforementioned rules.

6.15. Obligations of collaborators

The provisions referred to in the previous points are extended to all possible collaborators, consultants, agents and agents of the company.

7. RELATIONS WITH CUSTOMERS

7.1. Equality and impartiality

TEKNOICE S.r.l. undertakes to satisfy its Customers in compliance with the obligations set out in the relevant contract, the company also undertakes not to discriminate against its Customers.

TEKNOICE S.r.l. establishes a relationship with customers characterized by high professionalism and based on availability, respect, courtesy, research and the offer of maximum collaboration.

The satisfaction of its Customers represents a fundamental objective for TEKNOICE S.r.l. and, to this end, the company is committed to guaranteeing the quality of the services provided.

TEKNOICE S.r.l. undertakes to adopt towards customers a style of behavior based on efficiency, collaboration and courtesy, providing, in a clear and transparent way, accurate, complete and truthful information about the characteristics of the services offered, using simple and understandable language and ensuring equality treatment of all customers.

7.2. Contracts and communications

Contracts and communications with customers must be clear and compliant with current regulations.

The company undertakes to promptly and in the most appropriate manner communicate any information relating to any changes and variations in the provision of the service provided.

7.3. Relations with Customers - Quality

The company undertakes to ensure the achievement of the required quality and safety standards and to periodically monitor the quality of the service provided to the Customer.

The company is committed to promoting interaction with customers through the management and rapid resolution of any complaints and / or using appropriate communication systems.

TEKNOICE S.r.l. rejects litigation as an instrument aimed at obtaining undue advantages and resorts to it on its own initiative only when its legitimate claims do not find due satisfaction in the interlocutor.

The company protects the privacy of its customers, according to the regulations in force on the subject, undertaking not to communicate or disseminate the related personal, economic and consumer data, without prejudice to legal obligations.

8. RELATIONS WITH SUPPLIERS

8.1. Choice of supplier

The methods of choosing the supplier must comply with current regulations and the company's internal procedures provided for this purpose. The choice of the supplier and the purchase of goods and services of any kind must take place in compliance with the principles of competition and equality of the conditions of the bidders and on the basis of objective assessments relating to competitiveness, quality, usefulness and price. of supply.

In the selection TEKNOICE S.r.l. adopts objective and transparent criteria provided for by current legislation and does not preclude any supplier company, in possession of the requisites required, as deemed necessary, and the possibility of competing for the completion of a contract with it.

In selecting the supplier, the company must also take into account the ability to ensure the implementation of adequate corporate quality systems, where applicable, the availability of means and organizational structures and the need to meet confidentiality obligations.

Each selection procedure must be carried out in compliance with the broadest conditions of competition and any derogation from this principle must be authorized and justified.

8.2 Transparency

Relations with the company's suppliers, including financial and consultancy contracts, are governed by the rules of this Code and are subject to constant and careful monitoring by the company also in terms of the adequacy of the services or goods supplied with respect to the agreed consideration.

TEKNOICE S.r.l. prepares appropriate procedures to ensure maximum transparency of supplier selection and purchase of goods and services.

Through its management information system, and the existing organizational procedures, TEKNOICE S.r.l. is able to document the entire selection and purchase procedure such as to allow the reconstruction of each operation.

8.3 Correctness and diligence in the execution of contracts

The company and the supplier must operate in order to build a collaborative relationship and mutual trust. TEKNOICE S.r.l. undertakes to inform the supplier in a correct and timely manner regarding the characteristics of the business, the forms and payment times in compliance with current regulations and the expectations of the counterparty, given the circumstances, the negotiations carried out, the content of the stipulated contract.

The fulfillment of contractual services by the supplier must comply with the principles of fairness, correctness, diligence and good faith and must take place in compliance with current legislation.

8.4. Protection of the environment and ethical profiles

The company undertakes to promote, as part of the procurement activities, compliance with environmental conditions as well as to ensure that they are carried out in accordance with the ethical principles set out in this Code.

9. RELATIONS WITH PUBLIC BODIES

9.1. Corporate mission and general interest

The company pursues its objectives in line with its mission and collaborates effectively with public bodies responsible for regulating and controlling tax, accounting, administrative and legal compliance. TEKNOICE S.r.l. pursues these objectives by combining them with its mission and with the need for organizational and managerial autonomy of any economic operator.

9.2 Integrity and independence in relationships

In order to ensure maximum clarity in institutional relations, these are entertained exclusively through representatives who have received mandates from the corporate bodies and who are not in situations of conflict of interest with respect to the representatives of the institutions themselves. As part of the relationships maintained in various capacities with the institutions and public administrations, those who represent TEKNOICE S.r.l. they must operate with the utmost transparency, clarity, correctness, in order not to induce partial, false, ambiguous or misleading interpretations by institutional subjects.

10. IMPLEMENTATION AND COMPLIANCE WITH THE CODE OF ETHICS - DISCIPLINARY SYSTEM

10.1. Establishment and Composition of the Supervisory Body

TEKNOICE S.r.l. has established the Supervisory Body internally, with the task of supervising the implementation and compliance with this Code of Ethics and the organization, management and control models, pursuant to Legislative Decree 231/2001, implemented consistently with the Code itself.

The Supervisory Body is a company body with independence, full autonomy of action and control, whose activity is characterized by professionalism and impartiality, to which this office is attributed through a specific deliberative act of the Board of Directors.

The members of the Supervisory Board remain in office as established by the appointment of the Board of Directors and can be removed by the Board itself only for just cause.

10.2. Reports

The company Managers who receive any reports, from the reference structure, of any violations of the Code of Ethics, report it to the Supervisory Body. The Supervisory Body has free access to data, documentation and information useful for carrying out the activities for which it is responsible. The area managers are required to actively collaborate in carrying out the activities indicated above.

All interested parties, internal and external, are required to report verbally or in writing (with respect to the nature of the violation) and in a non-anonymous form, any non-compliance with this Code.

Internal authors of manifestly unfounded reports are subject to disciplinary sanctions, while external authors of manifestly unfounded reports are subject to the penalties provided for by current legislation.

The company protects the authors of the reports against any retaliation they may face for reporting incorrect behavior and keeps their identity confidential, without prejudice to legal obligations.

- Reports, if addressed to the Supervisory Body of TEKNOICE S.r.l., can be made either by physical mail to the address:

Supervisory Body of TEKNOICE S.r.l.
Via Lazio 37
20090 BUCCINASCO (Milan)

That of e-mail, to the address: **s.fraschini@pistochnilex.it**

An alternative channel for reporting to the Supervisory Body has also been established as follows address: **simone.fraschini@legalmail.it**

10.3. Disciplinary System

10.3.1 System of sanctions against employees and directors

Failure to comply with and / or violation of the rules of conduct indicated in the Code of Ethics by employees constitutes a breach of the obligations arising from the employment relationship and gives rise to the application of disciplinary sanctions provided for by law and collective bargaining.

These penalties will be proportionate to the gravity and nature of the facts. The management of disciplinary proceedings and the imposition of sanctions remain the responsibility of the company functions in charge and delegated to do so.

In the event of violations of the Code of Ethics by the Directors, the Supervisory Body must communicate the circumstance to the Board of Directors and the Board of Statutory Auditors, so that these bodies can take the appropriate initiatives in accordance with the law.

The company will, however, adopt the Model pursuant to Legislative Decree n. 231/2001, of a more detailed and typified system of sanctions, inspired by the general principles contained in this Code of Ethics.

10.3.2 System of sanctions against collaborators, suppliers, consultants and commercial partners (agents, resellers and the like)

Any behavior carried out in violation of the provisions of this Code by collaborators, suppliers, consultants and commercial partners (by way of example and not limited to: agents, resellers etc ...) linked to the company through a contractual relationship other than employment, may determine, in the most serious cases, the termination of the contractual relationship. The right to take action to obtain compensation for any damages suffered by the Company remains unaffected.