

CORPORATE SOCIAL RESPONSIBILITY CODE AND CODE OF ETHICS/CONDUCT

BY

TRANSTEC SERVICES SRL


Written by: Directorate General

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Introduction

TransTec Services Srl (hereinafter also referred to as the "Company") is a service and consulting company operating in the field of Technological Innovation.

Our company has always set itself the goal of upholding the highest ethical standards and conduct in business.

Therefore, TransTec Services Srl considers it essential to define and share in the form of a Code of Ethics behavioral guidelines to be taken as a reference in the performance of the daily activities of our company.

This Code of Ethics contains principles and provisions that constitute exemplary specifications of the general obligations of diligence, fairness and loyalty in the field of work.

Art. 1 - Recipients

The principles and provisions of the Code of Ethics are binding for

- the Sole Director and the shareholders of the company
- all the staff of TransTec Services Srl everywhere operating and / or located
- all external collaborators and Partners with whom you have contractual relationships, even occasional and / or only temporary, as well as all those with whom you follow work activities and commercial relationships in the context of the various relationships with TransTec Services.

Art. 2 - Requirements


Employees of TransTec Services Srl are required to know the rules contained in the Code of Ethics and to comply with the laws and regulations in force in all the countries in which the Company operates.

All employees of TransTec Services Srl have the obligation to refrain from actions and behaviors contrary to the guidelines established by this Code of Ethics and are required to report requests of any kind that has been addressed to them to violate ethical rules.

These obligations concern all employees of TransTec Services Srl wherever located and operating.

The Company's managers must communicate the rules of the Code of Ethics to employees, invite them to observe them, collect reports regarding shortcomings as well as constructive suggestions from employees for the improvement of the Company's Code of Ethics.

TransTec Services Srl undertakes to adequately inform the recipients about the rules contained in this Code of Ethics and requires them to comply with them in the performance of its activities and in the execution of the contracts stipulated.

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Art. 3 - Principles

Art. 3.1 Corporate responsibility and sustainability

All the staff of TransTec Services Srl is constantly committed to observing the law, regulations, ethical integrity and fairness, carrying out the company's activities and business in a framework of transparency, honesty, fairness and in full compliance with the rules set to protect competition.

TransTec Services Srl expressly condemns all forms of discrimination, corruption, forced or child labor.

Art. 3.2 Fairness

All recipients referred to in art. 1 of this Code of Ethics, whatever the nature and duration of the employment relationship with TransTec Services Srl, are required in business relations with third parties to guarantee ethical behavior based on correctness, transparency and efficiency.

The recipients are also personally responsible for the conservation of the company's material assets entrusted to them for the performance of their work tasks. All the staff of TransTec Services Srl uses the company's equipment, systems and assets, such as computer and telematics, only and exclusively for the exercise of work activities within the limits of their duties and skills.

Recipients may only accept gifts or any other form of benefit of modest value or non-material amount that do not compromise the integrity and reputation of the party and that cannot be interpreted as acts intended to obtain favors and advantages improperly. These gifts and benefits must therefore not exceed the uses, customs and code of ethics of TransTec Services S.r.l..


Art. 3.3 Prohibition of conflict of interest

Conflict of interest means a situation in which a manager or employee pursues with his actions and behavior purposes other than those of the company and / or tries to take advantage of business opportunities of TransTec Services Srl acting contrary to the fiduciary duties related to his position.

By way of example, but not limited to, the following constitutes a conflict of interest:

- if an action interferes with the decisions of the company;
- if an employee carries out work of any kind with competitors, customers, suppliers and / or third parties in contrast with the interests of TransTec Services Srl;
- the relationship between employees of TransTec Services S.r.l. and subjects of companies in possible contrast with the interests of TransTec Services Srl, in particular if it is a close relationship and if this is found between top management.

TransTec Services Srl requires strict compliance with the regulations governing the conflict of interest contained in laws and regulations.

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The recipients are required to inform their managers of the activities in which conflicts of interest with the Company may be configured and to respect the decisions and measures taken by the latter.

Art. 3.4 Confidentiality

In compliance with the provisions of the law, the regulations in force and this Code of Ethics, all recipients ensure the utmost confidentiality on the news and information that constitute the company's assets or are related to the Company's activities.

TransTec Services Srl in turn undertakes to protect the information relating to employees, managers and collaborators acquired within the company structure and / or in the management of business relationships and also undertakes to avoid any improper use of such information.


The recipients are therefore required, even outside working hours and during the suspension of the contract, not to disclose in any way the inside information of which they have become aware even accidentally in the exercise of their functions, such as by way of example but not limited to:

- information relating to tenders or orders managed, carried out by the Company, even if only in the preliminary phase of preparation, and which are not in the public domain in any form;
- information of any kind of any third party in relation to the Company, relating to data or information provided by them in any form to the Company by reason of its tasks, such as technical descriptive drawings of projects to be implemented, operational technical solutions and / or financial forecasts and offers;
- financial or economic data or information of the Company that is not in the public domain;
- data relating to the economic and financial situation of the Company as well as relating to projects, acquisitions, mergers and commercial strategies of TransTec Services Srl.
- data relating to services, products and/or technologies under development

Art. 3.5 - Conduct in business

Art. 3.5.1 Relations with public institutions

The relations of TransTec Services Srl with public, national, EU and international institutions as well as towards public officials or public service representatives, or bodies, representatives, agents, representatives, members, employees, consultants, persons in charge of public functions or services, public institutions, public administrations, public bodies, including economic bodies, public bodies or companies of a local nature, national or international must be based on the strictest compliance with the legislative provisions in force, the principles defined in this Code of Ethics and on the basis of the general criteria of correctness, transparency and loyalty.

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Art. 3.5.2 Customer relations

TransTec Services Srl pursues its business success on the markets through the offer of quality products and services at competitive conditions and in compliance with the rules set to protect fair competition.

TransTec Services Srl undertakes to observe the obligation to use customer data extremely confidentially, to provide with efficiency and courtesy, within the limits of the contractual provisions, high quality services and products that meet or exceed the reasonable expectations of the customer and to make available, following the truth in communications of all kinds, accurate and exhaustive information about the services and products so that the customer can make informed decisions.

Art. 3.5.3 Relations with external collaborators

TransTec Services Srl is committed to seeking in external collaborators high professionalism and commitment to sharing the principles and contents of the Code of Ethics.

The staff of TransTec Services Srl is required to


- observe the internal procedures for the selection and management of relations with external collaborators and not to preclude any person in possession of the requisites from competing to win a collaboration with the Company;
- adopt only objective evaluation criteria in the selection of collaborators, according to transparent methods;
- include in the contracts the confirmation of having read the Code of Ethics of TransTec Services Srl and the obligation to comply with the guidelines contained therein;
- maintain a frank and open dialogue with external collaborators, in line with good commercial practices.

Art. 4 - Internal policies

Art. 4.1 Human resources

TransTec Services Srl recognizes that human resources are a factor of fundamental importance for the development of the Company. The management of human resources is based on respect for the personality and professionalism of each of them in the general framework of the current legislation.

TransTec Services Srl is aware that the high professionalism achieved by its employees and their dedication to the Company are essential and determined factors for the pursuit and achievement of company objectives. It follows for each employee and / or collaborator of TransTec Services S.r.l. a duty of continuous professional updating and, at the same time, a commitment of TransTec Services S.r.l. to guarantee suitable training and professional growth tools. TransTec Services S.r.l. recognizes the decisive contribution that this process receives from professionals with greater working seniority and promotes the transfer of their knowledge and their professional attitude to younger staff.

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TransTec Services Srl ensures equal opportunities at any level of the organization, according to criteria of merit and without any discrimination.

Art. 4.2 Staff selection and recruitment

The employees and collaborators of TransTec Services Srl are hired with a regular contract, in accordance with the provisions of the applicable legislation and collective bargaining from time to time. No form of irregular work or exploitation of particular forms of collaboration shall be tolerated.

Upon establishment of the employment relationship, each employee or collaborator signs the commitment to comply with the provisions of this Code of Ethics and receives accurate information relating to:

- characteristics of the function and tasks to be performed;
- regulatory and remuneration elements, as regulated by the national collective labour agreement and company contracts;
- rules and procedures to be adopted in order to avoid possible health risks associated with work.

This information is presented to the employee or collaborator so that the acceptance of the assignment is based on an effective understanding.

As part of the personnel management processes, the decisions taken are based on the correspondence between the needs of the Company and the profiles of the employees / collaborators as well as on considerations of merit.

Art. 4.3 Centrality of the person

TransTec Services Srl is committed to respecting the dignity of workers and their fundamental rights.

Conduct that constitutes physical or moral violence is prohibited without exception.


TransTec Services Srl requires that in internal and external working relationships no harassment or attitudes attributable to mobbing practices be given rise.

The:

- create an intimidating, hostile, isolation or otherwise discriminatory working environment against individuals or groups of workers;
- hinder the individual job prospects of others for mere reasons of personal competitiveness or that of other employees.

Any form of violence or sexual harassment or referring to personal and cultural diversity is prohibited. The:

- make any decision of relevance to the working life of the recipient subject to the acceptance of sexual favours or personal differences;
- induce their collaborators to sexual favors through the influence of their role;
- propose private interpersonal relationships, despite an express or reasonably obvious dislike;

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- allude to physical or mental disabilities and impairments or to forms of cultural, religious or sexual orientation diversity.

Art. 4.4 Transparency of accounting records

Accounting records are based on accuracy and completeness.

Every movement of money, payment transaction, collection, issue of guarantees is carried out in compliance with the law, in particular Legislative Decree 231/2007 and Legislative Decree 201/2011.

All members of management and all employees are required to cooperate, within the scope of their competences, so that the management facts are documented correctly and promptly.

Conduct that could prejudice the transparency and traceability of financial statements is expressly prohibited.

All recipients must not be involved or involved, even by way of competition, in operations that may substantiate the laundering of proceeds from criminal activities or, in general, illicit or receiving stolen goods.

For each accounting operation, adequate supporting documentation of the activity carried out shall be kept in the records in such a way as to allow:

- the easy and punctual accounting registration
- the accurate reconstruction of the operation, also to reduce the likelihood of material or interpretative errors.

Art. 4.5 Protection of health, safety and the environment

TransTec Services Srl guarantees working conditions that respect individual dignity and safe and healthy working environments, also through the dissemination of a culture of safety and awareness of risks, promoting responsible behavior by all.

Each recipient is called upon to contribute personally to maintaining the quality of the working environment.

The Company undertakes to periodically review the performance and efficiency of its systems, to achieve the objectives set in terms of safety, health and the environment.

The activities of TransTec Services Srl must be conducted in accordance with international agreements and standards and the laws, regulations, administrative practices and national policies of the countries in which it operates, relating to the protection of the health and safety of workers and the environment.

Art. 4.6 Anti-money laundering and corruption

TransTec Services Srl considers it essential to prevent and avoid the infiltration of organized crime into the economy.

The recipients must not in any way and under any circumstances be involved in events relating to criminal associations or in the laundering of money from illegal or criminal activities, not even in the form of facilitation (including economic) of the activity of the aforementioned associations. The same, before entering into legal relations with

suppliers or other business partners, will be required to ensure the moral integrity, reputation and good name of the other party.

The Company guarantees compliance with all national and international rules and regulations in force on organized crime and anti-money laundering, in particular compliance with Legislative Decree 231/2007 and Legislative Decree 201/2011.

TransTec Services Srl prohibits and rejects any action aimed at promoting or unduly favoring its interests in order to unlawfully take advantage of them and / or capable of undermining the impartiality and autonomy of judgment of the third party.

In this regard, the Company does not allow managers, employees and collaborators to promise or pay to third parties or accept sums of money, gifts, goods or other utilities to / from third parties, directly or indirectly, for the purpose of procuring undue advantages to the Company.

Art. 5 - Infringement and sanctioning consequences

Compliance with the principles of this Code of Ethics is part of the contractual obligations assumed by collaborators, consultants and other subjects in business relations with the Company.

All recipients, in the event that they become aware of alleged violations of this Code of Ethics, must inform the Company's management without delay, which will verify the validity of the alleged violations, hearing, if necessary, the person who made the report and / or the alleged author.

Art. 6 – Whistleblowing


With reference to art. 5 of this document, TransTec Services Srl invites all recipients to use the following contact details for reporting any kind of alleged violations of this Code of Ethics:

adim@transtecservices.com or
info@pec.transtecservices.com

TransTec Services Srl guarantees the confidential treatment of all information received in relation to this subject.

Art. 7 Final provisions

This Code of Ethics has been approved by the Management of TransTec Services Srl. Any variation and / or integration of the same will be promptly disseminated to the Recipients.

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