



COMMUNICATION ON PROGRESS YEAR 2020

The Communication On Progress (COP) is the annual reporting document which is used by Tecniconsult S.P.A. to inform its own stakeholders about the actions that aim at implementing the ten principles of the United Nations Global Compact.

Headquarters: BUSTO ARSIZIO (VA), Italy

Date: 26th February 2021

Notes: GC ACTIVE LEVEL

INTRODUCTION

The Communication On Progress (COP) is the annual reporting document which is used by **Tecniconsult S.P.A.** to inform its own stakeholders about the actions that aim at implementing the ten principles of the United Nations Global Compact.

The “GC ACTIVE LEVEL” was identified; the Basic COP Template was used to prepare this document and includes the following elements:

- a declaration by the Managing Director, who expresses the continuous support to the Global Compact and renews **Tecniconsult S.P.A.’s** constant commitment towards the initiative and the relevant Principles.
- A description of the practical actions that **Tecniconsult S.P.A.** started (and wants to use) in order to implement the Principles of the Global Compact in each of the four thematic areas (human rights, labour, environment and anti-corruption).
- A measurement of the results.

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DECLARATION OF CONTINUOUS SUPPORT

Busto Arsizio (VA), Italy, 26th February 2021

Dear Sirs and Madams,

In my capacity as the Chairman of Tecniconsult S.P.A.'s Board of Directors, it is my great pleasure to confirm and renew our commitment and the full support to the 10 principles of the Global Compact for the year 2021.

Tecniconsult S.P.A. joined the Global Compact on 12th April 2017; therefore, this document is the third COP that was drawn up and sent by the Organisation to inform our Stakeholders about the activities and the results that were achieved during the year 2020.

Tecniconsult S.P.A.'s commitment towards the initiative is in line with our Corporate Policy and the will to make a tangible contribution.

Kind regards,

Eng. Andrea Pelizzola
Chairman of Tecniconsult
S.P.A.'s BoD

INTRODUCTION TO THE ORGANISATION

Tecniconsult S.P.A. was established on 4th May 1976; since 1996, it has been operating within the municipality of Busto Arsizio, Italy. The business purpose of the Company includes the activities to study, design, develop, manufacture, market and sell pultruded products, which are made with thermoplastic and/or thermosetting materials, in case reinforced with fibres. The main market of the Company includes the reinforcements to build optical-fibre cables for telecommunication and similar purposes.

1976	Foundation of the Organisation
1996	Settlement of the Organisation within the Municipality of Busto Arsizio (Varese - Italy)
1999	First Certification in compliance with the UNI EN ISO 9001 standards
2012	First Certification in compliance with the UNI EN ISO 14001 standards
2018	<ul style="list-style-type: none"> - First Certification in compliance with the International SA8000 Standard - Membership to ELITE, international programme of the Italian Stock Exchange - Implementation of the organisation model established in the Italian Legislative Decree D.Lgs 231/2001 and of the Code of Ethics - Achievement of the award for High-Quality Work-Related Learning ("Bollino per l'Alternanza di Qualità," BAQ)
2019	Running of a leased part of a building purchased by Saba Srl

TECNICONSULT AND ITS STAKEHOLDERS

Tecniconsult S.P.A. has always paid great attention to the relationship with all its stakeholders and, by introducing the Corporate Social Responsibility Management System, further stressed the importance of maximum trust and transparency. The stakeholders (or “interested parties”) are all parties (people, organisations, institutions...) that are somehow influenced by **Tecniconsult S.P.A.’s** activity, and include:

- Personnel
- Customers
- Suppliers
- Financing Entities
- The Community (Projects of Public Benefit Organisations and Schools)
- Public Administration

During the year 2018, the Company obtained the SA 8000:2014 certification (International standard that was created in 1997 by the United States SAI Entity and including nine elements (sections of the standard) that aim at increasing the competitive ability of the Organisations that voluntarily guarantee the ethical conduct of their own production supply-chain and cycle).

The compliance of **Tecniconsult S.P.A.’s** Corporate Social Responsibility System was certified by DNV as independent third party (Certificate no. 254833-2018-ASA-ITA-SAAS dated 31st January 2018) by using an auditing mechanism that is similar to the one that is used for quality management systems pursuant to the UNI EN ISO standards, 9000 series or environmental management systems pursuant to the UNI EN ISO standards, 14000 series.

In this field, an action plan was defined in favour of the community, which includes:

- Subscription to the “Generazione d’Industria” (Industry Generation) project, which is promoted by the Unione degli Industriali della Provincia di Varese (Industrialists Association of the Province of Varese) to receive high-school students who want to combine the Work-Related Learning period with summer work training.
- Donation to hospitals fundraising of the Province of Varese - Covid-19 emergency
- Donation to the Global Compact Network Italy.
- Grants to Amare onlus- a non-profit organization-, in order to support schooling projects in Ethiopia.

Since 2017 **Tecniconsult S.P.A.** adheres to the UNITED GLOBAL COMPACT.

Eventually, to assure **Tecniconsult S.P.A.**'s commitment towards its own Stakeholders and the attention given to the satisfaction of its customers, the Company obtained the quality certification (UNI EN ISO 9001:2015) in March 2021. The relevant certificate is shown below.



HUMAN RIGHTS – Principles



Principle 1

Businesses should support and respect the protection of internationally proclaimed human rights.

Principle 2

Businesses should make sure that they are not complicit in human rights abuses.

ACTIONS

Tecniconsult S.P.A. strongly believes in the importance of its own human capital and of maintaining a positive atmosphere at the Company, where each person can not only be protected, but also enhanced. The Organisation pays attention to the continuous improvement of the conditions of the workplace and health-safety of the workers; in addition, it gives great importance to updating and training the workers, being convinced that a positive work atmosphere greatly influences the entire existence of the worker and the relevant family, as well as the achievement of corporate goals.

The Company relies on 30 employees, the production activity is carried out over three shifts Monday to Friday, as well as office and support activities, which are performed during the work day, 5 days a week.

As for the management of the relationships with its employees, **Tecniconsult S.P.A.** pays special attention to the protection of privacy, the respect of freedom, the safety of the workers, the implementation of suitable working hours, the right to holidays, periods of sick leaves and leaves for personal problems.

The person and the respect of the relevant fundamental rights always come first pursuant to the provisions of the Italian regulations: all employees are hired according to the National Labour Collective Agreement (CCNL rev. 11th December 2020 for the workers of the industry of rubber, electrical cables and similar products, as well as of the industry of plastic materials); it is provided for that all workers will be enrolled into INPS (Italian National Social Security Institution) and INAIL (Italian National Institute for the Prevention of Accidents at Work).

MEASUREMENT OF THE RESULTS

The most significant data that were examined are as follows:

Health and Safety

	Year 2019	Days of accident leaves	Year 2020	Days of accident leaves
n. accidents	0	0	1	10
at the factory	0	0	0	10
travelling	0	0	0	0

Percentage of employees trained about safety matters

	Year 2019	Year 2020
High risk (4h basic + 12h)	100%	100%
Low risk (4h basic + 4h)	100%	100%

Training activities were regularly carried out in order to improve the skills of the personnel concerning Quality, Health, Safety and Environment management, besides specific professional competences.

During the year 2020, at Tecniconsult spa, 30 people attended training activities, totalling 160 hours, of which:

108 hours: training activity about health and safety (in-house and external).

13,5 hours: training activity about quality.

8,5 hours: training activity about environment.

30 hours: training activity about administration.

Organisation of the work

	Total	Men 23	Women 7
n. employees with permanent contract (including both full-time and part-time workers)	22	22	7
n. employees under targeted placement (*) part-time	1	1	-
Staff leasing	-	-	-
Supply of fixed term work	-	-	-

(*) Pursuant to the National regulations in force, "targeted placement" means the set of "instruments that allow suitably assessing the work skills of disabled people and introduce them into a suitable workplace by examining jobs, support measures, positive actions and solutions to the

problems that are connected with the premises, the tools and the interpersonal relationships at work and socialising places."

The targeted placement leads to the institution of compulsory hiring. The companies with more than 14 employees must reserve a share intended to:

- civilian invalids with percentage of invalidity included between 46% and 100%, invalids as a result of accidents at work with percentage of invalidity higher than 33%, invalids by service (former public servants, soldiers included), war invalids and civilian invalids suffering disabilities included between category one and eight, blind persons and deaf-mutes;
- protected categories: Italian asylum-seekers, orphans and widow(er)s of people who died due to occupational accidents, war or service and deemed equivalent (widow(er)s and orphans are deemed equivalent to the spouses and the children of severely disable persons due to occupational accidents who are declared impossible to employ, severely disable persons by service or war with first category pension), victims injured in the course of duty, terrorism and organised crime.

LABOUR – Principles



Principle 3	Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
Principle 4	Businesses should uphold the elimination of all forms of forced and compulsory labour.
Principle 5	Businesses should uphold the effective abolition of child labour.
Principle 6	Businesses should uphold the elimination of discrimination in respect of employment and occupation.

ACTIONS

The freedom of association is a right that was set forth by the Italian Constitution, whose sect. 18 states that “the citizens have the right to freely associate, without any authorisation, for purposes that are not forbidden by the criminal law.”

Tecniconsult S.P.A. shares the important content of the above-mentioned section and, therefore, supports the aforesaid freedom. At the same time, it favours the cooperation among all employees in order to solve collective problems.

Tecniconsult S.P.A.’s transparency is the starting point for each individual activity, such as, among the others: the contracts and the communications that involve both in-house and external personnel of the Organisation, as well as the commitment to act in compliance with ethical standards all the time.

The workers who are members of a Trade-Union association are not discriminated in any way or treated differently.

Any form of forced labour or the use of child labour will not be tolerated by **Tecniconsult S.P.A.** or its suppliers. The Italian regulations provide for that a worker must be at least 16 y.o., but **Tecniconsult S.P.A.** hires adult personnel being at least 18 y.o.

In addition, special attention has always been given to the possibility to combine the commitment at work with family needs.

Tecniconsult S.P.A. assures equal opportunities and the freedom to follow one person's specific principles, as well as religious and political beliefs without being subject to any form of discrimination or behaviours that are detrimental to personal freedom.

When hiring new staff, the assessments are based on objective parameters, such as the gained experience, the reached school level and the skills that are suitable for the required job. No investigation is made about possible political, Trade-Union, religious beliefs or ethnical origin, which may influence the decision-making procedure.

During the year 2018, Tecniconsult S.P.A. obtained the SA8000-2014 certification, which ended a process that was started in the year 2017; the above-mentioned certification is the result of the effort and the active participation by the people who form the Organisation.

The certification will be valid for three years.

The last supervision visit, which took place during the month of December, obtained a positive result. The next activity by a Certified Third-Party Entity is scheduled for the month of June 2021.

- Industrial relationships
Unionisation rate: no. 2 employees enrolled into a Trade Union.
Percentage of strike hours over the working hours: no strike hour during the year 2020.
- To complete the SA8000 certification, the Organisation takes into consideration the improvement opportunities that were reported by the Entity and plans the relevant implementation in view of a continuous improvement of its Management System.

The SA8000-2014 certificate is shown below.



ENVIRONMENT – Principles



Principle 7	Businesses should support a precautionary approach to environmental challenges.
Principle 8	Businesses should undertake initiatives to promote greater environmental responsibility.
Principle 9	Businesses should encourage the development and diffusion of environmentally friendly technologies.

ACTIONS

Tecniconsult Spa obtained the UNI EN ISO 14001:2015 certification.

The achievement of the above-mentioned recognition assures the full compliance with all law fulfilments about the environment, which can be applied to the activity of the Organisation and to the desire to improve its environmental performance.

In particular, the year 2020 provided for an activity intended to monitor and control environmental aspects concerning:

- Energy consumption
- Consumption of raw materials, production and management of wastes
- Emissions to the atmosphere

Tecniconsult spa identifies itself within the threshold of the so-called energy-intensive companies. The company is therefore subject to an energy and efficiency monitoring, having to comply with an energy audit every four years. Every year, during the month of March, a reporting about consumption is prepared and uploaded into the ENEA (National Agency of Energy Efficiency) portal pursuant to section 7, paragraph 8, of the Italian Legislative Decree D.LGS. 102/14.

Tecniconsult spa undertakes to comply with the two goals that are dedicated to energy within the UN's 2030 Agenda:

- Responsible consumption and production
- Clean and accessible energy



The UNI EN ISO 14001:2015 certificate is shown below.



CERTIFICATO N. **171**
CERTIFICATE N.

Si certifica che il Sistema di Gestione Ambientale di
We hereby certify that the Environmental Management System operated by

TECNICONCONSULT SPA

seede legale: V.LE DELL'INDUSTRIA, 40 — 21052 BUSTO ARSIZIO (VA)

UNITA' OPERATIVE / OPERATIVE UNITS
V.LE DELL'INDUSTRIA, 40 — 21052 BUSTO ARSIZIO (VA)

è conforme alla norma
is in compliance with the standard

UNI EN ISO 14001:2015

per le seguenti attività
for the following activities

IAF14

*Progettazione e produzione di profili in vetroresina per cavi a fibra
ottica ed altre applicazioni industriali mediante i processi di
polimerizzazione ed estrusione.*

*Design and manufacturing of glass fiber composite profiles for fiber optic cables and
other industrial applications through polymerization and extrusion processes.*

Sistema di gestione ambientale conforme alla Norma UNI EN ISO 14001:2015 valutato secondo le prescrizioni del
documento ACCREDIA RT-09

Prima emissione
First issue
06/03/2012

Emissione corrente
Current issue
01/03/2021

Scadenza
Expiry date
07/03/2024

L'Amministratore Delegato
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Member (cert. Accord. 8) of the
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Signatory of IIR, IIR and IIR Mutual
Recognition Agreements



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Signatory of IIR, IIR and IIR Mutual
Recognition Agreements



THE INTERNATIONAL CERTIFICATION NETWORK

CERTIFICATE

CISQ/IIP S.r.l. has issued an IQNet recognized certificate that the organization

TECNICONCONSULT SPA

legal place: V.LE DELL'INDUSTRIA, 40 - 21052 BUSTO ARSIZIO (VA)

V.LE DELL'INDUSTRIA, 40 - 21052 BUSTO ARSIZIO (VA)

has implemented and maintains an

Environmental Management System

for the following scope:

*Design and manufacturing of glass fiber composite profiles for fiber optic cables and
other industrial applications through polymerization and extrusion processes.*

which fulfills the requirements of the following standard:

ISO 14001:2015

Issued on: 2021/03/01

First issued on: 2012/03/08

Expires on: 2024/03/07

This attestation is directly linked to the IQNet Partner's original certificate and shall not be used as a
stand-alone document.

Registration Number: **IT-58599 IIP 171**



Alex Stoichitoiu
President of IQNET



Mario Romeri
Ing. Mario Romeri
President of CISQ

IQNet Partners:

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SIREM QAS International Malaysia SQS Switzerland SRAC Romania TEST St Petersburg Russia TSE Turkey VUQS Serbia

* The list of IQNet partners is valid at the time of issue of this certificate. Updated information is available under www.iqnet-certification.com

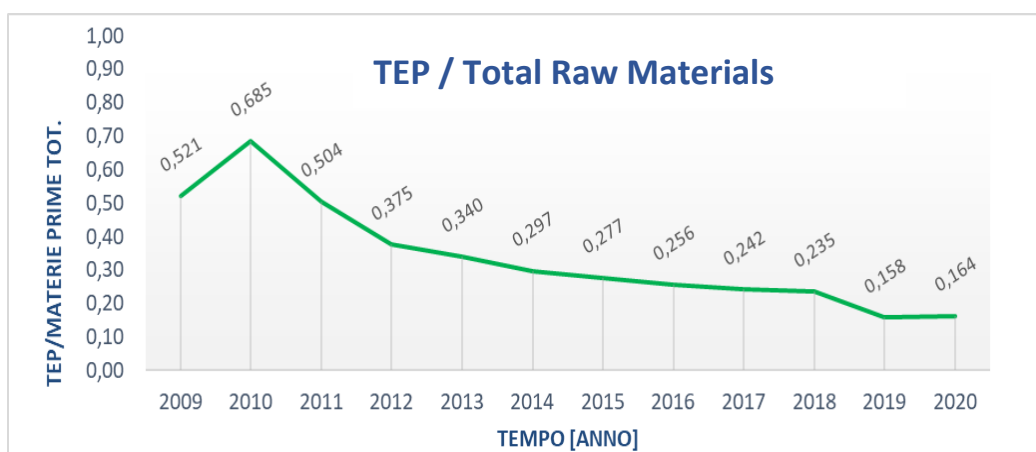
MEASUREMENT OF THE RESULTS

WATER AND ENERGY CONSUMPTIONS

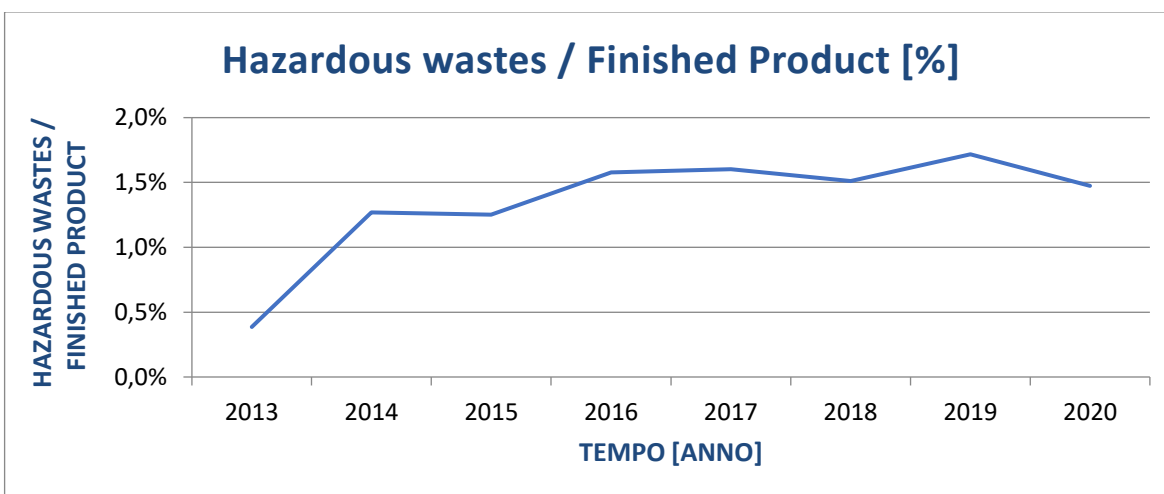
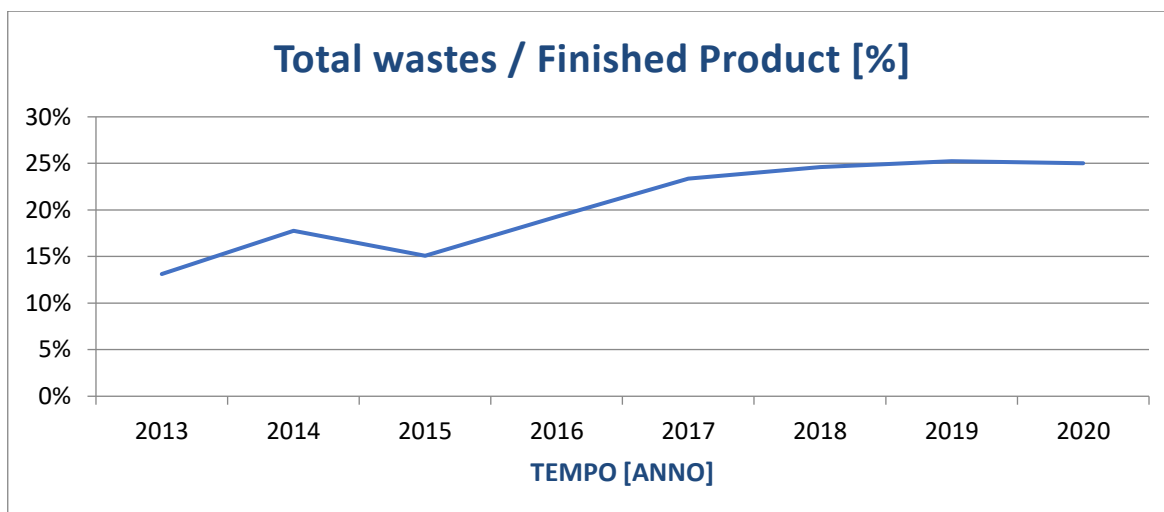
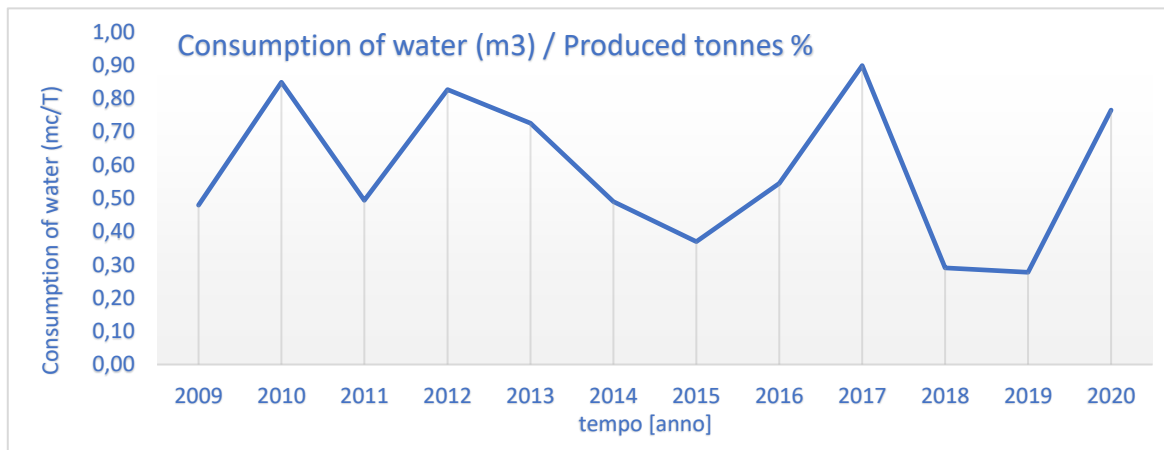
The year 2020 recorded a trend of energy consumption (assessed in TEP*/1000 km of Finished Product) equalling 0,7: result of the technological improvements at the production departments and continuation of the activities that had been implemented in previous years.

*TEP (tonnellata equivalente di petrolio, tonne of oil equivalent, TOE).

Conversion coefficients in TEP for the main fuels and Energy carriers pursuant to MISE (Italian Ministry of economic development) dated 18th December 2014.

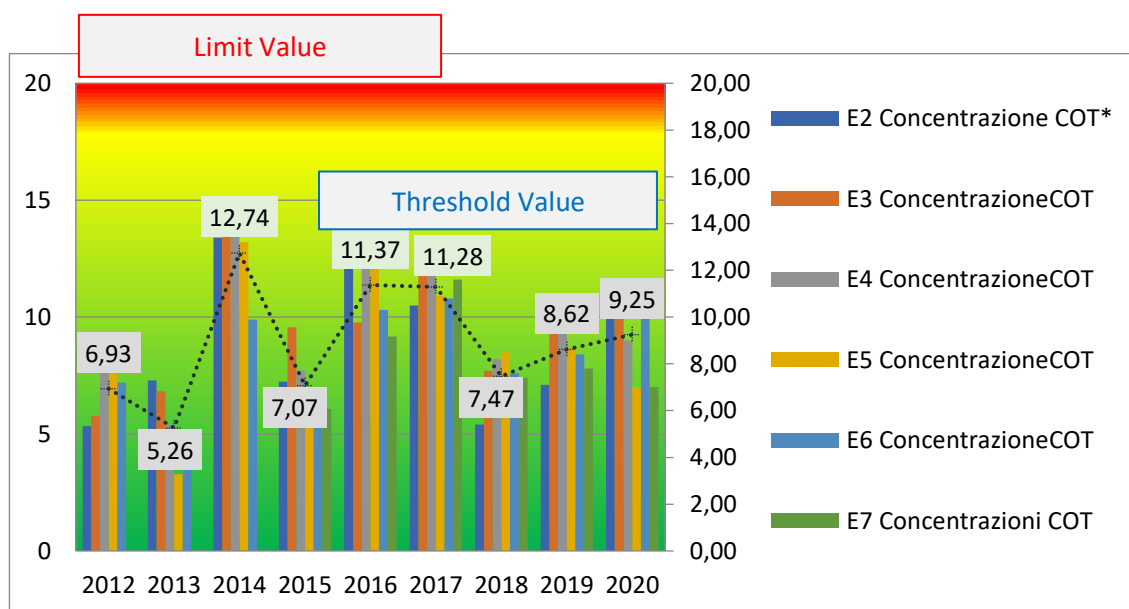
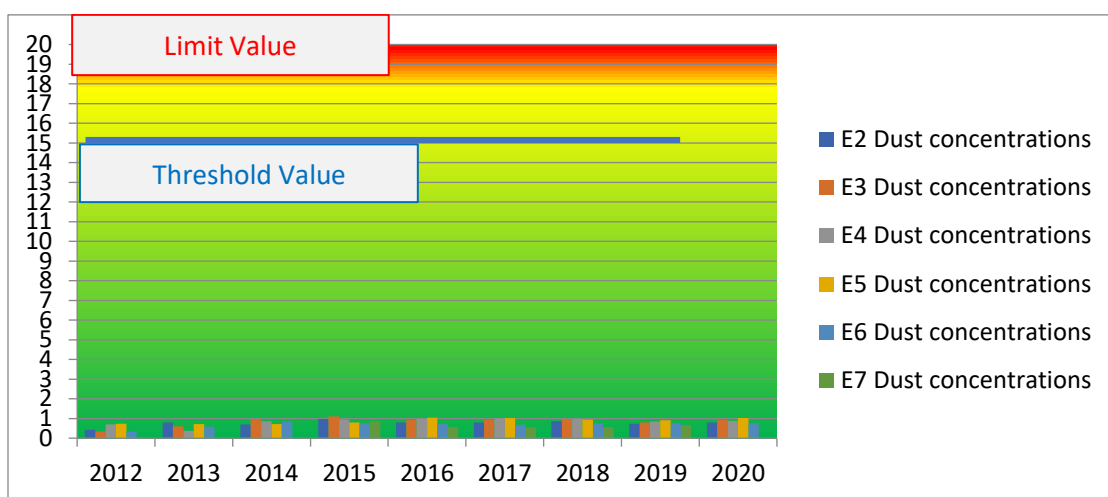


WATER CONSUMPTION, PRODUCTION AND MANAGEMENT OF WASTES



EMISSIONS TO THE ATMOSPHERE

The year 2020 recorded the full compliance with the authorisation limits concerning the emissions to the atmosphere, which are connected with production sites and the heating of the work premises.



*COT (TOC) Total Organic Carbon

ANTI-CORRUPTION – Principles



Principle 10 Businesses should work against corruption in all its forms, including extortion and bribery.

ACTIONS

Tecniconsult S.P.A. operates pursuant to transparency, fairness and impartiality criteria.

No corruption situation has ever been tolerated and all activities have been carried out in full compliance with the rules and the law.

On 19th July 2018, the Board of Directors implemented the “Organisation, Management and Control Model pursuant to the Italian Legislative Decree D.Lgs. 231/01” and the Code of Ethics. At the time of Model implementation, the Supervision Body was appointed, as well.

With reference to the actions to fight corruption, it is necessary to particularly point out the behavioural principles that are included in the specific part of the Model, such as paragraphs 4.1. - criminal offences committed in the relationships with the public administration; 4.5 - corporate crimes; 4.8 - handling of stolen goods, laundering and use of money, assets or advantages of illegal origin, self-laundering.

On 28th March 2019, the Board of Directors approved revision 2 of the document in order to implement some legal amendments. The latter stress an increase in the interdictory sanctions relating to committing the administrative infringement caused by the offence of concussion, illegal influence to give or promise advantages and corruption, as well as the introduction of the offence of passive corruption among the predicate offences under the administrative responsibility of the entity.

The implementation of the model provided for:

- The appointment of a Supervision Body
- The implementation of a Code of Ethics.

MEASUREMENT OF THE RESULTS

Tecniconsult S.P.A. is constantly compliant; in addition, its modes and times fulfil all legal requirements of fiscal, social and environmental type, and connected with the health and safety of the personnel who work at the Company.

	Year 2020
Convictions or sanctions imposed by the authorities	0
No. of sanctions due to the infringement of the regulations about safety, products, labelling, privacy and misleading advertising	0

SOCIAL PERFORMANCE

The following pages of this COP show an extract of the Social Budget, which was drawn up by the Company (26th February 2021) and identifying the aspects of social performance.

The Company gives great attention to: the quality of the workplace and the life of its own employees, the respect of the environment and the transparency in the relationships with the institutions.

The achievement of the certificate in compliance with the requirements of the SA8000 Standard further proves the commitment of the Company.

CHILD LABOUR

The Company undertook not to make use of child labour or to cooperate with the entities who do.

The fulfilment of compulsory schooling is the minimum condition to start a work relationship that, at any rate, must be assured in order to protect the health and safety of the worker.

The Company does not exercise any form of coercion to its own personnel and creates work relationships only in the forms that are established by law and collective agreements, complying with the protections they provide for.

Both at the beginning and during the work relationship, the Company asks the worker to supply only the documents that are provided for by the law. No right of the employees is limited to particular contents of the work performance.

The Company makes use of modes that aim at pursuing the stability and the continuity of the job, it favours the conditions to better achieve the work activities and supervises so that the job is characterised by fairness and professional incentives.

FORCED WORK

Tecniconsult S.P.A. excludes any form of coercion to its own personnel.

The work relationships are only based on the law and collective agreements, and all protections they provide for will be respected. At the time of the hiring, the worker will be asked to supply the documents that are provided for by the law.

The Company tries to retain its own personnel by means of a dynamic and stimulating work atmosphere.

DISCRIMINATION

Tecniconsult S.P.A. absolutely refuses any discrimination and has always assured an equal treatment to all employees, regardless of specific aspects, such as sex, gender, religion, origin, Trade-Union or political membership, both at the time of hiring and during the following phases of the work relationship.

SALARIES

Teniconsult S.P.A. supplies salaries that comply with the provisions of the National Labour Collective Agreement (National Labour Collective Agreement (CCNL) for the workers of the industry of rubber, electrical cables and similar products, as well as of the industry of plastic materials) and any other possible agreement about this matter.

The pay slips are prepared by an experienced external consulting company, fully comply with contract agreements and include the withholding taxes and the contributions that are established by the regulations.



Attachments to this document:

1) Code of Ethics



TECNICONSULT S.P.A.

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Code of Ethics

Implemented by

Tecniconsult S.p.A.'s Board of Directors

by resolution dated 19-07-2018

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1.INTRODUCTION

This Code of Ethics (hereinafter the “Code”) describes Tecniconsult’s ethical commitments and responsibilities in carrying out its business and corporate activities.

The philosophy of the Company supports a sustainable corporate development at economic, social and environmental levels. This means that you need to be competitive, innovatory and create value not only by means of production efficiency, but also by continuously meeting customers’ needs, with social commitment, ethical respect of all internal and external stakeholders, and the protection of the environment.

Indeed, the corporate values that drive Tecniconsult business activity include: transparency, legality, commitment, efficiency, social responsibility, professionalism at all organisational levels, involvement and motivation of the corporate personnel, reliability and quality, fulfilment of compliance obligations and any deed that was voluntarily signed, innovation, protection of health and safety at work and the environment.

1.1 SCOPE OF APPLICATION AND ADDRESSEES

The Addressees of this Code include the representatives of corporate bodies, the employees, the suppliers of goods and services, as well as the entities which work in the name and on behalf of the Company.

All addressees must know the Code of Ethics, implement it and report possible incompliant behaviours to the reference staff (line managers and members of the Supervision Body).

Tecniconsult undertakes to assure that the Code of Ethics is regularly disclosed at internal and external levels.

1.2 VALUE OF THE CODE

The Code is an integral part of the employment, as the rules it contains complement the behaviour that must be fulfilled by the addressees.

Therefore, the infringement of Code standards may be considered a non-performance of employment obligations or disciplinary offence, with the relevant legal consequences and possible actions for the compensation of the damages that are caused by the same breach.

As for the addressees that are not employees, the compliance with the Code is an essential pre-requisite for the continuation of the professional relationship with the Company.

2. STANDARDS OF CONDUCT

2.1. RELATIONSHIPS WITH THE EMPLOYEES

2.1.1. Code of conduct in the relationships with the personnel

During personnel selection and hiring activities, the assessment is carried out by matching the profile of the candidates with corporate needs and expectations, in compliance with equal opportunities for all involved parties, and without any form of favouritism, nepotism or patronage.

The information that is requested during personnel selection and hiring activities strictly depends on the verification of aspects that are provided for by professional, psychological and attitudinal requirements, respecting the private life and the opinions of the candidate.

Tecniconsult prevents all forms of discrimination to its employees, offer equal opportunities to them depending on professional qualifications and individual skills of every person, irrespective of their religious faith, gender, race, political or trade-union beliefs.

The personnel are hired by means of a regular employment contract; no form of irregular work will be tolerated and the personnel coming from third countries must be provided with regular residence permit.

In addition, the company prohibits the use of child or forced labour and other inhuman or illegal working practices; it does not tolerate any type of discrimination, harassment or victimisation, and promotes an atmosphere that favours the development of relationships among the employees, thus encouraging their involvement.

2.1.2. Conflict of interests

All Tecniconsult employees must avoid situations which may lead to conflicts of interests and must refrain from taking personal advantage of business opportunities they get to know thanks to their own business role.

Even in case of just a potential conflict of interests, the employee must communicate it to his/her line manager, who, in his/her turn, must inform the Managing Director and the Supervisory Body.

2.1.3. Protection of corporate assets

Every employee must work in a careful way to protect all assigned corporate assets, including the assets that are assigned and used to carry out the specific tasks. In addition, the same assets have not to be used in an illicit or improper way, by means of conscientious behaviours which are in line with the objectives and the operating standards that are established in order to regulate such use, and carefully documenting it. All corporate assets that are provided by Tecniconsult must be used in functional and consistent ways depending on the performance of specific work activities.

2.1.4. Management of information and confidentiality

The employee must know and implement the provisions that are established in corporate standards and policies about information security to assure the relevant integrity, confidentiality and availability.

The information that is collected during the performance of the assigned activities must keep strictly confidential and must be suitably protected; furthermore, the information can be used, communicated or disclosed, both inside and outside of the Company, only in compliance with the regulations in force and the corporate procedures.

The information that are stored in corporate information and telecommunication systems, electronic mails included, is property of the Company and must be used only to carry out corporate activities, according to company's modes and limits.

2.1.5. Reporting duties

Any person who detects possible irregular situations or receives instructions that go against legal provisions, corporate directives, this Code of Ethics, the Organisation Model pursuant to the Italian Legislative Decree D.Lgs. 231/01, employment contracts and all reference standards, must promptly report them to the Supervisory Body and to the Managing Director.

Any retaliation against a person who, in good faith, reports possible breaches of the Code of Ethics and of the corporate management models or request to clarify the relevant implementation modes will be considered an infringement. Likewise, the behaviour of anybody accusing other employees of infringements being aware that such breaches do not exist, must be considered a violation.

2.2.RELATIONSHIPS WITH THE SUPPLIERS OF GOODS AND SERVICES

2.2.1. Code of conduct in the relationships with the suppliers

The procedures for the procurement of goods and services are characterised by the search for the maximum competitive advantage for the Company, granting equal opportunities to all suppliers. They are also based on pre- and contractual behaviours that are subject to essential and mutual loyalty, transparency and collaboration.

The selection of the suppliers must be assured by complying with specific parameters, such as objectivity, ethics, quality, price convenience and equity, respect of the competition, impartiality, ability and efficiency so as to allow creating a relationship, thus assuring a suitable and sufficient group of candidates at the time of the selection activity.

2.3.RELATIONSHIPS WITH THE CUSTOMERS

2.3.1. Relationships with the customers

The attention given to customer satisfaction is the guiding principle to manage the relationships with the latter. To protect the image and the reputation of the company, it is essential that the relationships with the customers are based on full transparency and honesty, as well as on the compliance with the laws. As a consequence, any person who is directly involved in the relationship with the customers must provide comprehensive, clear, precise and truthful information about the supplied products and services.

According to public and/or available information in compliance with the regulations in force, Tecniconsult prohibits the creation and the maintenance of business relationships with entities that are involved in illegal activities, in

particular relating to the crimes that are established in the Italian Legislative Decree D. Lgs.231/2001 and, at any rate, with entities that lack the necessary requirements of business reliability and professionalism.

2.3.2. Contracts, agreements and communications to the customers

The contracts, the agreements, the orders and the communications to the customers must comply with the following principles, so that they are not misleading and untruthful:

- clear and simple, drawn up in a language that resembles the normal language of the stakeholders;
- compliant with the regulations in force, without making use of elusive or, at any rate, unfair practices;
- compliant with corporate business policies and the parameters they establish;
- complete, so that no remarkable element is ignored by the customer decision.

2.4.RELATIONSHIPS WITH THE PUBLIC ADMINISTRATION

Besides working in compliance with the laws and the regulations in force, Tecniconsult is willing to keep correct and transparent relationships with the Public Administration, which includes any public entity, independent administrative agency, natural or legal persons, which act as public officials or managers of public services.

2.4.1 Rules of conduct concerning corruption and bribery risks

Corruption acts include both illegal payments/provision of benefits, which are promised or given directly by Italian entities or their employees, and illegal payments/provision of benefits, which are promised or given by means of people who act on behalf of the above-mentioned entities, both in Italy and abroad.

It is not allowed, directly or indirectly, or by means of a third party, to offer or promise money, gifts or rewards, in any form whatsoever, or put illicit pressure, or promise any object, service, performance or benefit to directors, officers or employees of the Public Administration or rather to entities in charge of public services or rather to their relatives or cohabitants in order to facilitate the completion of an official record or against official duties. Likewise, it will also include the purpose of favouring or damaging one party subject to civil, criminal or administrative lawsuits in order to obtain a direct or indirect advantage for the Company.

In addition, anybody who receives explicit or implicit demands for benefits of any type whatsoever by Public Administration officials, as listed above, will have to immediately:

- interrupt any relationship with them;
- inform the Supervisory Body and the relevant corporate manager in written form.

The provisions that are specified in previous points have not to be circumvented by making use of different forms of aids and contributions which, disguised as tasks, consulting activities, advertising, etc., have the same purposes that are prohibited in the previous points.

It is prohibited to offer or accept any valuable object, service and performance in order to be regarded in a more favourable way concerning any relationship with the Public Administration.

As for the countries that have the habit of offering gifts to customers or others, the gifts can be maintained, but they have to be of appropriate type and modest value, always in compliance with the laws. At any rate, such gifts have never to be interpreted as the search for a preferential treatment.

2.4.2. Conduct concerning the declarations and the statements to the Public Administration

It is not allowed to use or make declarations or documents that are false or certifying untrue statements, or rather omitting information in order to obtain, to the advantage or in the interest of the Company, contributions, loans or other distributions somehow granted by the State, a Public Body or the European Union.

It is prohibited to mislead anybody by means of artifices or frauds in order to obtain an unfair gain for the Company, to the detriment of somebody else. The breach of the aforementioned prohibition becomes even more serious if it is the State or a public body to be misled.

2.4.3. Political contributions

Any contribution provided by the company to political representatives in any country must comply with local laws and the Italian regulations.

3. SAFETY AND ENVIRONMENT

Tecniconsult believes that the compliance with the regulations about health and safety at the workplace is a critical factor for its own success and all activities are managed from the point of view of accident prevention, for the health and safety of the workers in compliance with national and international standards about this matter.

The Company arranges technical, organisational and economic conditions that aim at suitable accident prevention in order to create and continuously maintain healthy and safe working premises. In addition, Tecniconsult undertakes to spread and strengthen a culture of safety and risk awareness among all its collaborators, trying to promote responsible behaviours by all employees and collaborators that work within Tecniconsult with different roles.

Training and information about the risks that are connected with the specific operating task/activity are always assured together with personal protective equipment according to the activity being carried out.

Tecniconsult pays attention to the safeguard of environmental and social contexts, and manages the environmental impacts that are connected with its own activity, concerning the products, as well as production technologies and processes, in compliance with law provisions and a policy of sustainable investments also to reduce the environmental impact by means of technological innovations.

4. TRANSPARENCY AND CORRECTNESS OF ACCOUNTING AND CORPORATE INFORMATION

Every action, operation or transaction must be correctly managed within the corporate accounting system according to the criteria that are established by the law and the applicable accounting principles; in addition, it must be properly authorised, verifiable, legitimate, consistent and congruent.

Each person who is involved in these activities must collaborate so that management items are correctly and promptly recorded in the accounting books.

Any person who finds out omissions, forgeries or modifications of the documentation must report them to his/her line manager and the Supervisory Body.

All entities that, for any reason whatsoever, provide their activity for the economic, asset and financial management of the Company, have not to behave in a way that can somehow prevent the control and audit activities that fall under the competence of the bodies in charge. Therefore, it is absolutely prohibited to hide materials and/or documents in order to misdirect, prevent or hinder specific control activities.

5. IMPLEMENTATION, COMPLIANCE AND AMENDMENTS TO THE CODE OF ETHICS

This Code of Ethics was approved by Tecniconsult SpA's Board of Directors on 19/07/2018. Any possible amendments and/or updates will be approved by the same corporate body, and then they will be promptly communicated to the involved parties. Tecniconsult undertakes that the standards of this Code will be complied with also by means of the Supervisory Body.

5.1. Reporting of the infringements

Any person who learns a fact and/or circumstances or behaviours that infringe the Code must promptly report them to his/her manager and to the Supervisory Body. The Company deals with the creation of suitable communication channels that can be used by the involved parties to send their reports about the implementation or the infringements of the Code.

The Managing Director and the Supervisory Body strive so that the reporting people are not subject to retaliation, discrimination or disadvantages, thus assuring the suitable confidentiality of the above-mentioned people (except in case of possible law obligations which may establish otherwise).

5.2. Measures

The Managing Director defines the actions that must be started in case this Code is infringed, in compliance with the disciplinary model that is established in the Organisation Model pursuant to the Italian Legislative Decree D.Lgs. no. 231/2001. The above-mentioned actions must responsibly aim at discouraging transgressions, as well as at promoting accountability and the compliance with this Code. To establish the appropriate actions to be started in every individual case, you must consider all pieces of available information, including the type and the seriousness of the infringement, if the latter is ascribable to an isolated event or rather it repeated in time, if the infringement seems deliberate or

unintentional, if the person being considered was previously informed about the correct behaviour and if the same person was connected to other breaches in the past.

Also the directors, the executives and the employees will be subject to disciplinary measures in case they know a breach and do not promptly act to report or correct it, and in case they order or approve the same infringements.

5.3. Communication and spreading of the Code of Ethics

The Code of Ethics is communicated to the involved parties inside and outside of the Company by means of specific communication and spreading activities. The Code of Ethics is distributed to all employees and put at disposal of all third parties who have business relationships with Tecniconsult.