



## DS195R02 CODE OF ETHICS - EGICON SRL

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## 0. GENERAL INFORMATION

Egicon S.R.L. specialises in the design, production, purchase, sale, import and export of products for direct use or for use in the construction of transport vehicles, infrastructure and equipment.

## 1. MISSION

**Egicon S.R.L.** seeks to contribute, in respect of the environment, to the cultural, economic and social growth of its employees and the economic fabric of which it is part, through the development and production of sector-specific technologies.

Egicon's objective therefore, in light of its continuous and extensive investments in all the business processes directly and indirectly involved in the development, promotion and manufacture of these technologies, is to be an important Italian company within this technological sector.

With this in mind, **Egicon S.R.L.** has adopted a Code of Ethics in which the company's values are identified, highlighting all the rights, duties and responsibilities of all those who, for whatever reason, operate within the structure: the Board of Directors, all employees and, more generally, all those linked by a collaborative relationship with **Egicon S.R.L.**

**Egicon S.R.L.**'s mission – directed mainly at meeting the needs of its stakeholders and employees – requires that specific attention is paid to the guiding principles of this Code of Ethics, which contains the guidelines that must inspire the Company's activities and accompany the behaviour of individuals for the proper functioning, reliability and image of the organisation itself.

Therefore, adopting this Code expresses a context within which it is fundamental to meet the needs and expectations of the Company's stakeholders and employees, aiming to recommend and promote a high standard of professionalism and prohibit those behaviours that contradict, not only the regulatory and deontological provisions that are relevant from time to time, but also the values that the Company itself intends to promote.

**Egicon S.R.L.** makes this Code of Ethics available within its organisation and shares it on its official website.

Compliance with the Code of Ethics is required of all Egicon S.R.L. employees.

## 2. CORPORATE VALUES

### 2.1 Honesty and Impartiality

Honesty is the ethical principle of reference for all the activities carried out by the Company.

Recipients of **Egicon S.R.L.**'s Code of Ethics are required to comply with current national and EU laws, regulations or internal codes and, where applicable, the rules of professional ethics.

Under no circumstances will the Company tolerate or justify conduct in violation of these rules.

Relations with stakeholders, at all levels, must be based on the criteria of fairness, collaboration, loyalty and mutual respect.

**Egicon S.R.L.** does not allow any kind of discrimination on the basis of age, gender, sexual orientation, health, race, nationality, political opinions or religious beliefs of its representatives in decisions that affect relations with its representatives.

### 2.2 Repudiation of terrorism

**Egicon S.R.L.** repudiates all forms of terrorism and/or subversion of the democratic order.

To this end, it undertakes not to establish, in any way, working or commercial relations with subjects, whether natural and/or legal persons, involved in terrorism, and not to finance, or in any way facilitate, any of their activities.

### 2.3 Prevention of corruption

In conducting its activities **Egicon S.R.L.** prohibits any action against or by third parties aimed at promoting or favouring their own interests, taking advantage thereof, or which could prejudice judicial impartiality and autonomy.

**Egicon S.R.L.** does not allow the payment or acceptance of sums of money or gifts to/from third parties in order to procure direct or indirect advantages for the Company; it is however permitted to accept or offer gifts that fall within the usual customs of hospitality, courtesy and for special occasions.

**Egicon S.R.L.** undertakes not to offer, accept or request money or any other reward, advantage or benefit, either directly or indirectly through intermediaries, for the purpose of issuing a measure, to any public body, and declares that it undertakes to immediately report to the relevant Police Force, any illicit request for money or other benefit or offer of protection or extortion of any kind.

## 2.4 Fight against organised crime

**Egicon S.R.L.** strongly condemns and fights with all the tools at its disposal any form of organised crime, including mafia-related crime.

**Egicon S.R.L.** will make a special effort to check the due integrity and reliability requirements of its commercial counterparties, such as suppliers, consultants, contractors, customers and partners.

## 2.5 Protection of individual personality

**Egicon S.R.L.** supports and respects human rights, in compliance with the UN Universal Declaration of Human Rights. It recognises the need to protect individual freedom in all its forms and repudiates any manifestation of violence, especially if it is aimed at restricting personal freedom, as well as any element of prostitution and/or child pornography.

**Egicon S.R.L.** is committed, within the scope of its activities and in particular among its employees and collaborators – to promoting the sharing of the above principles.

## 2.6 Value of human resources

Respect for the physical and cultural integrity of the individual represents an ethical reference value for **Egicon S.R.L.**

The Company protects and promotes the value of human resources, in order to improve and increase the experience and skill-sets possessed by each employee. It is also committed to ensuring that its employees have working conditions that respect individual dignity and safe and healthy working environments.

### 3. SCOPE AND ADDRESSEES

The Code of Ethics applies to all the Company's activities and constitutes a reference point for the regulations adopted by **Egicon S.R.L.**

In the event that even a single provision of the Code of Ethics should conflict with provisions laid down in internal regulations or procedures, the Code shall prevail over any of these provisions.

Every employee and associate is required to promptly report violations or suspected violations of this Code to management.

The Company guarantees that it will protect those reporting a concern from any kind of retaliation, discrimination or penalisation, also ensuring the confidentiality of their identity, without prejudice to legal obligations.

## 4. RULES AND STANDARDS OF BEHAVIOUR

### 4.1 Guiding criteria in policies towards employees/associates

#### 4.1.1 *Protection of dignity, health and safety at work*

- **Egicon S.R.L.** is committed to offering equal employment opportunities without distinction based on ethnicity, religion, opinions, nationality, gender, physical condition, age, or social conditions
- **Egicon S.R.L.** shall promote and protect the health of its employees/associates
- **Egicon S.R.L.** shall handle the technical and professional training of its employees/associates
- **Egicon S.R.L.** guarantees that, in the exercise of the Company's activities, there shall be a constant reconciliation of the orientation for profit with a respect for ethics and legality in conducting its business, in consideration of the Company's social responsibility, and in particular the need to prevent risks and crime.

Managers must be the first to set an example for all personnel by following the principles of the Code of Ethics, company procedures and regulations in the performance of their duties, handling its dissemination among employees and urging them to submit requests for clarification or proposals for updating where necessary.

#### 4.1.2 *Compliance with the law and deontological standards*

Compliance of conduct with the law and the applicable rules of ethics is a mandatory requirement for the Company and all its employees.

All employees must be aware of the legal implications of their activities.

The behaviour of Company associates/employees, in addition to being in line with company policies, must be based on principles of collaboration, responsibility, professionalism and diligence.

Where consistency between the rules of professional diligence and the law is not immediately comprehensible, judgement and common sense shall be employed; each employee will consult and receive advice and directions from the respective managers and the legal service, where necessary.

Directors, employees at any level and associates, each within their respective competencies and functions, are required to strictly observe company procedures.

## 4.2 Corporate Bodies

The activity of the Corporate Bodies is based on full compliance with the rules set out in the Articles of Association and national and EU legislation in force.

The members of the Board of Directors are required:

- to actively engage so that the Company can benefit from their specific expertise,
- to continuously participate in the work of the Board and in the Shareholder Meetings, promptly reporting any situation of interest involving them,
- to hold confidential any information acquired in the performance of their duties,
- to always let the interests of the corporate mission prevail over the particular interest of the individual.

## 4.3 Traceability, transparency, segregation of duties

In carrying out its business activities, the Company and its associates/employees are obliged to comply with the principles of traceability and transparency.

## 4.4 Duties and responsibilities

### **a) Conflict of interest**

Everybody is required to comply with this Code also in their external relations. In particular, everyone must avoid situations in which conflicts of interest may arise and refrain from taking personal advantage of business opportunities related to the performance of their duties.

In this regard, therefore, directors must comply with the obligations set forth in Article 2391, first paragraph, of the Italian Civil Code. Therefore, any Director, who has, on their own behalf or on behalf of third parties, an interest in a certain Company transaction, must inform the shareholders, specifying the nature, terms, origin and scope thereof.

Where situations of potential conflict may arise, communication between the employee/associate and his/her superior will be fundamental in order to resolve the issue.



Remuneration paid to associates/employees, agents or other public or private entities providing services for the Company must always be commensurate with the services rendered.

**b) Company information and confidential data.**

The confidentiality of information is also an asset that the Company protects via its associates/employees: any information obtained by an associate/employee in relation to their activity is the property of **Egicon S.R.L.**

Data concerning both natural and legal persons will be processed in compliance with the provisions in force.

Employees who become aware of information not in the public domain and/or confidential data must use the utmost caution and care when using such information and only for the purposes permitted by law, avoiding its disclosure to unauthorized persons, both inside and outside **Egicon S.R.L.**

Computer processing of information is subject to the security controls necessary to safeguard the Company from undue intrusion or illicit use.

The destruction of material or electronic media containing such information must take place in compliance with the procedures governing the matter and within the limits provided by law.

The Company undertakes to protect information relating to its employees or third parties, in compliance with the provisions of EU Reg. 679/2016 and subsequent modifications and integrations.

**Egicon S.R.L.** is committed to managing the flow of information to stakeholders in such a way that it is always complete, clear and transparent and that, with regard to data with economic, financial, accounting or management content, it also meets the requirements of truthfulness, completeness and accuracy.

### **c) Relations with the Public Administration, political organisations and trade unions**

Relations with Public Institutions will be maintained only by the functions authorised to do so.

In particular, all relations involving company functions with the Public Administration must be aligned with principles of diligence, transparency and honesty.

The Company's collaborators/employees must behave with the utmost fairness and integrity in their relations with employees and representatives of public bodies, political forces and trade unions in full compliance with the law, the principles set out in the Code of Ethics and internal protocols.

Entertainment expenses and gifts to public employees and officials, provided they are of modest value, must comply with the Company's general procedures regarding expenses, as well as the laws and regulations of the public bodies involved.

It is in any case not permitted to offer money or gifts to managers, officials or employees of the Public Administration or their relatives, both Italian and from other countries, or to representatives of political parties, unless they are gifts or benefits of modest value.

It is prohibited to offer or accept any object, service, performance or favour of value in order to obtain more favourable treatment in relation to any relationship with the Public Administration.

It is forbidden to alter, in any way whatsoever, the functioning of a Public Administration (PA) computer or telematic system and/or access without right and in any way whatsoever any data/information or software contained in a PA computer or telematic system, thereby obtaining an unfair profit for the Company to the detriment of the State.

Untruthful statements may not be made to national or community public bodies in order to obtain public grants, contributions or subsidised financing, or to obtain concessions, authorisations, licences or other administrative actions.

It is prohibited to use sums received from national or community public bodies by way of disbursements, contributions or financing for purposes other than those for which they were allocated.

It is forbidden to mislead anyone with artifices or deceptions in order to procure an unfair profit for the Company to the detriment of others. The violation of this prohibition is even more serious if it is the State or a public company that is being misled. "Unfair profit" may be direct or indirect and may include, in addition to contributions, financing and other

disbursements granted by the State, a public company or the European Union, also concessions, authorisations, licences or other administrative actions.

In the specific case of a tender with the Public Administration, one must operate in compliance with the law and correct business practice, with the express prohibition to engage in conduct that, in order to benefit the Company, or pursue an interest of the same, is such as to constitute a criminal offence.

It is also forbidden to give public entities or persons designated by them or connected to them, abnormal or undue discounts, or in any case contrary to normal commercial practice and internal company regulations.

If **Egicon S.R.L.** avails of a consultant or a third party to be represented in its relations with the Public Administration, the same directives given to the Company's employees shall apply to that party.

Any financing of political parties must be carried out in accordance with the legislation in force.

**Egicon S.R.L.** refrains from taking any initiatives that may directly or indirectly constitute undue pressure on political or trade union representatives or political or trade union organisations.

The above rules may not be circumvented even through third parties.

#### ***e) Relations with suppliers***

The choice of suppliers and the purchase of goods and services are made by the appropriate company functions on the basis of objective assessments of competitiveness, quality and integrity.

#### ***f) Human resource-management and tasks of employees/associates***

The fundamental principles of human resource management are as follows:

- to offer equal employment opportunities without discrimination on grounds of race, sex, age, sexual orientation, physical or mental handicap, nationality, religious belief, political or trade union membership;
- to ensure fair and meritocratic treatment;

- to spread and consolidate a culture of safety in the working environment and to work to maintain, especially through preventive actions, the health and safety of workers, both physically and psychologically;
- to ensure the protection of employees' privacy and their right to work without being subject to unlawful conditions;
- to prevent and prosecute bullying and personal harassment of all kinds.

Therefore, the competent functions shall:

- adopt criteria based on merit, competence and in any case, purely professional, for decisions relating to employees,;
- select, hire, train, pay and manage employees without discrimination;
- create a working environment where the personal characteristics of the individual worker do not give rise to discrimination.

The Company, in compliance with the Conventions of the International Labour Organization, undertakes:

- to respect fundamental human rights;
- to prevent child exploitation;
- not to use forced labour or labour performed under conditions of slavery or servitude;
- not to establish any working relationship with persons involved in terrorism or organised crime associations.

The Company requires that in internal and external business relations there is no place for:

- reduction to, or maintenance in, a state of subjection by means of violence, threats, deception, abuse of authority, taking advantage of a situation of physical or mental inferiority or a situation of necessity or by promising or giving money or other advantages to those who have authority over the person;
- harassment of a sexual nature.

Employees/associates have a regular employment contract and no form of irregular or child labour is tolerated except for company internships applied in compliance with current regulations.

In order to establish the employment relationship, the employee/associate must sign the relevant contract, as well as the commitment to comply with the provisions of the Code of Ethics.

**Egicon S.R.L.** is committed to preserving the health and safety of workers by adopting specific company protocols and procedures, especially through preventive actions. To this end, it is committed to promoting and disseminating the culture of safety at work, also through specific training and information programmes.

The directors, employees and associates undertake to comply with the rules and obligations deriving from the reference legislation on health and safety at work and from this Code.

Employees/associates must behave responsibly and respectfully in respect of the operating procedures implemented for the use of company assets, documenting their use where required.

All **Egicon S.R.L.** employees/associates are committed to implementing and respecting all actions aimed at preserving the integrity and dignity of the user, in compliance with management processes and quality of service.

All employees/associates undertake to diligently adopt the provisions of the company's security policies, in order not to compromise the functionality and protection of computer systems, not to send emails that are threatening, insulting or containing indecorous expressions, not to make inappropriate comments that may harm the dignity of persons and/or damage the image of Egicon S.R.L., not to visit websites with indecorous and offensive content and not to use the Internet in an abusive manner or in violation of copyright law.

## 5. COMPETITION

**Egicon S.R.L.** considers competition to be an asset to be protected and ensures compliance with the legal provisions on market protection.

Agreements between businesses and in any event all situations which may distort competition, in particular agreements containing exclusivity clauses, pricing constraints, territorial restrictions, are subject to antitrust legislation.

Advance verification by legal experts must be requested in any case of potential conflict with antitrust rules.

## 6. ENVIRONMENT AND COLLECTIVE INTERESTS

**Egicon S.R.L.** ensures compliance with all national and international laws on environmental protection and public and national health, in particular by monitoring and checking that atmospheric emissions and waste disposal are carried out in accordance with current regulations and company environmental programmes.

Any use of hazardous substances shall be carried out in strict compliance with the regulations in force.

The necessary measures shall be taken to prevent any accidents which could harm the community, public health or the environment.

All addressees of this code are obliged not to behave in any manner prohibited by environmental protection laws.

In addition to ensuring compliance with environmental regulations, the company has also obtained environmental certification in accordance with ISO 14001 and has adopted an integrated management system.

## 7. MONITORING

Management must constantly monitor that conduct complies with the Code and, if necessary, implement special inspection programmes.

The bodies responsible for verifying the effectiveness of the internal monitoring system are: the Board of Directors.

Any violation of the principles and provisions contained in this Code of Ethics by its addressees must be promptly reported to the Board of Directors.

Should the reports received require, in compliance with current regulations, confidential handling (including the maintenance of anonymity) **Egicon S.R.L.** undertakes to protect such confidentiality, without prejudice to legal provisions, regulations or procedures applicable to the case in question.

## 8. ADOPTION, EFFECTIVENESS AND AMENDMENTS TO THE CODE

This revision of the Code (Rev02) has been approved and will enter into force from October 2020.

The Code will be made available to addressees in paper form in an accessible place (company notice board).

Any update, amendment or addition to this Code must be approved by the Board of Directors.