

CODE OF ETHICS

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INTRODUCTION

1. Premise

1.1 The value of the Code of Ethics

This Code of Ethics is the instrument drawn up by DE NITTIS SRL to define the principles and the values of corporate ethics that DE NITTIS recognizes, accepts, shares and applies, and the entire responsibility that these, along with the respective collaborators, assume in internal and external relations.

The general principles of this Code of Ethics refer primarily to the Italian Constitution: recognizing the fundamental legal statute of the State as the absolute ethical reference for the DE NITTIS SRL business.

1.2 The application and the dissemination of the Code of Ethics

The compliance of the contents of the Code of Ethics by all those who work for DE NITTIS SRL is of fundamental importance for the proper functioning, the reliability and the reputation of DE NITTIS itself, indispensable factors for the success of the company.

DE NITTIS SRL is committed to disseminating and promoting the knowledge of the Code of Ethics to the employees and all those who work for DE NITTIS SRL, also by publishing it on the company website, supervising observance and providing suitable instruments of information and control.

As for the external recipients of this Code, DE NITTIS SRL, commits itself to introducing contractual clauses and/or to obtain signed declarations that formalize the awareness of the Code of Ethics, the adhesion and respect for the principles of the Code of Ethics.

DE NITTIS SRL promotes the control of the respect for the provisions of the Code of Ethics as a righteous practice to guarantee the work of individuals and of the functioning of the company.

1.3 Business conducted

DE NITTIS SRL operates in the sector of the commercialization of Devices for Individualized Protection for the protection of the health of workers. The observance of high levels of quality for which it strives, the safeguard of the environment and the promotion of the economic and social development of the territory in which it operates, are objectives that are constantly pursued and that integrate the mission of DE NITTIS SRL.

1.4 Sustainability and corporate social responsibility

DE NITTIS SRL commits itself to contribute actively to the promotion of the sustainable development of the community and of the environment in which it operates and is present.

All the activities are planned and carried out in the awareness of the Social Responsibility that DE NITTIS SRL has towards all its stakeholders: employees, clients, suppliers, community, commercial and financial partners, institutions, associations of the category and trade union representatives.

Hence DE NITTIS SRL commits itself to disseminating the knowledge of the values and the principles inside and outside and to setting up suitable control procedures.

2. Vision, Mission and Values

The values upon which DE NITTIS SRL bases its own strategy and requires the commitment of all the personnel are:

- Client satisfaction
- Sustainability
- Responsibility
- Growth and development of the collaborators
- Transparency
- Change and flexibility
- Belonging
- Teamwork

Client satisfaction

Acting, in the everyday working context, to improve the quality of life and satisfy the needs of the client: taking stock of criticism to improve work performance, respecting the commitments made to generate trust and bringing enthusiasm to the workplace so as never to feel complacent with the results obtained.

Sustainability

Contributing to the well-being and to the progress of the community and the Company, in terms of social, economic and environmental progress, through personal contribution and with the involvement of all the parties: colleagues, clients, suppliers and the local community.

Responsibility

Always answer for one's own actions and the results attained, observing the principles of clarity, transparency, honesty and correctness. It is the ability to take initiative, to make appropriate use of time, money and all the available resources, considering also the social and environmental impact of these actions.

Growth and valorisation of collaborators

Allowing the growth and the valorisation of collaborators means increasing the value of the business.

The people who work at DE NITTIS are the driving force of the company's success

and only by promoting their growth and valorising the contributions can we attract the most valid resources and feed their enthusiasm and their daily commitment. The commitment to discover, develop and promote the personal skills is a fundamental element of the pact between the company and the individual.

Transparency

We communicate the company themes clearly and promptly. This is the best basis for a relationship of trust and transparency.

Transparency increases our credibility vis-à-vis other parties and attributes value to our work.

Change and flexibility

To be ready and willing to respond, promptly and efficiently, to the variations in the world that surrounds us, knowing how to combine the value of the company tradition with the cultures of the territories of origin, with an open attitude to new situations and to flexibility.

Teamwork

Working together for a common goal, each with different responsibilities and skills, but all with the explicit intention of “adding value” to the result of the work carried out individually. Placing attention and valorising the contribution of all the people who participate in the process, both as employees and as suppliers: we are all part of a single team.

DE NITTIS SRL is certified according to the norm UNI EN ISO 9001:2015 and has begun the process for the SR 10 certification – Social Responsibility.

3. General principles

3.1 Recipients and purpose

In the present Code of Ethics the general principles and rules of behaviour that guide the management and the company's internal and external relations have been identified. Such a document constitutes an instrument with which DE NITTIS SRL, in the completion of its mission, is committed to contributing to the socio-economic development of the territory and of the communities.

The norms of the Code of Ethics apply without any exception to the administrators and to the employees and to all those who work for the achievement of the company goals.

The management is required to observe the contents of the Code of Ethics when proposing and implementing the projects, actions and investments useful for enhancing the patrimonial, managerial and technological values of the company, the

economic and social well-being of the employees and of the collectivity. It is the duty firstly of the administrators and the directors to make the values and the principles contained in the Code of Ethics a reality, assuming responsibility both towards the inside and the outside.

The employees must adapt their own actions and behaviour to the principles and criteria of conduct as required by the Code of Ethics.

All the behaviour of the employees in the performance of the working activity must be inspired to :

- utmost correctness from a point of view of management
- complete and transparent information
- formal and substantial legitimacy
- clear and truthful accountancy

All the company activities must be carried out with commitment and professional rigour.

Every employee must supply professional expertise according to the responsibilities and the functions assigned to them, acting in such a way as to safeguard the prestige of DE NITTIS SRL.

The relations between employees, at all levels, must be characterized by criteria and behaviour of correctness, collaboration, loyalty and reciprocal respect.

3.2 Commitments

DE NITTIS guarantees

- the dissemination and knowledge of the Code of Ethics;
- the constant updating of the contents of the Code;
- the interpretation and the implementation of the provisions of the Code of Ethics;
- the verification of every notification of a violation of the Code of Ethics;
- the evaluation of the facts and the application of adequate sanctions, in case of the violation of the norms of the Code of Ethics as foreseen from point 4 to point 8.

3.3 Commitments of all the employees and collaborators

All the employees pledge to:

- know and adopt behaviour coherent with the norms contained in the Code of

Ethics and the norms of reference that regulate the activity carried out within the scope of their function;

- abstain from behaviour contrary to such norms
- seek clarification from their superiors, if necessary, for the application of the norms of the Code of Ethics;
- refer to their superiors or to the management any possible violation of the norms of the Code of Ethics or any request to make a violation that has been asked of them. Such reports may also be done anonymously;
- collaborate with the Management to verify the possible violation of the norms of the Code of Ethics.

The Directors and Managers of company structure or function in the execution pledge to :

- select accurately, according to their own skill, employees and external collaborators to entrust with tasks exclusively to persons that give their full assurance to commit themselves to respecting the norms of the Code of Ethics;
- promote among the employees the knowledge and the sharing of the norms of the Code of Ethics as an essential part of the quality of work performance;
- make the employees respect the norms of the Code of Ethics, as well as facilitate and safeguard reporting of possible violations of the norms of the Code of Ethics by the employees;
- refer promptly to the previously indicated Managements namely the Supervisory Body of the member company concerned for the area of responsibility, any possible reports from their own employees;
- adopt immediate and indispensable corrective measures required by the situation;
- impede any kind of retortion.

To third parties, all employees must:

- inform them adequately about the obligations imposed by the Code of Ethics;
- expect the observance of the obligations that directly regard their activity;
- adopt opportune initiatives in case of failure by third parties to comply with the norms of the Code of Ethics.

3.4 Structures of reference, implementation and control

Structures of reference, implementation and control in the area of the Code of Ethics is the Social Performance Team (Committee): that is responsible for:

- promoting the knowledge of the contents of the Code of Ethics;
- ensuring the constant updating and promotion of the contents of the Code;
- ensuring the interpretation and the implementation of the provision of the Code of Ethics;

- set up criteria and procedures for reducing the risk of violations of the norms of the Code of Ethics;
- promoting and verifying the knowledge and the implementation of the Code of Ethics inside and outside the company;
- ensuring the verification of every report of violation of the Code of Ethics, the evaluation of the facts and the application, in the case of a violation of the norms of the Code of Ethics as foreseen from point 4 to point 8, or adequate sanctions.

With the decision of the Committee, the Code of Ethics is periodically approved, modified and revalued.

3.5 Contractual value of the Code of Ethics

The observance of the norms of the Code of Ethics is an essential part of the contractual obligations of the employees of DE NITTIS SRL according to the articles 2104 and 2106 of the Civil Code.

The violation of the norms of the Code of Ethics, foreseen from point 4 to point 8, constitutes failing to observe the contractual obligations of the working relationship and can be cause for the application of disciplinary sanctions, according to the laws, from the National work contract and from the company disciplinary code, also with regard to the conservation of the work relationship, and may lead to the compensation of damages deriving from the same.

The observance of the Code of Ethics is also requested from:

- the administrators that, in case of non-compliance, are liable according to the articles 2392 and 2407 of the Civil Code;
- all the third parties who have contractual relations on pain of termination of the contract itself.

The faculty is retained, by the head of the company, to require compensation for all the damages caused to the same in consequence of the afore-mentioned violation.

The application of the system of sanctions is independent from the outcome of any criminal proceedings undertaken by the judicial authorities in the case that the behaviour to be censured is also an illegal offence.

CONDUCT CRITERIA

4. General conduct criteria

4.1 Observance of the Constitution, the laws, the regulations and the ethical principles

Anyone who, for whatever reason, works for DE NITTIS SRL is committed and obliged to behave in the full observance of the constitutional principles, the laws, the administrative authorizations and every regulation.

The commitment and the obligation are assumed by all the administrators, the top executives, the directors, the employees, the collaborators, the specialists, the advisors and the parties that act on behalf of DE NITTIS SRL.

4.2 Respect for human rights and for the dignity of individuals

DE NITTIS considers as unrenouncible points in the definition of its values the United Nations Universal Declaration of Human Rights, the International Labour Organization Conventions and Recommendations.

Anyone who, for whatever reason, works for DE NITTIS must respect the dignity of individuals, be they colleagues, suppliers, clients or other parties, and avoid every discrimination, direct or indirect, founded on reasons of trade union membership, politics, religion, race, language or sex, recognizing the absolute value of the fundamental principles of the Constitution of the Italian Republic.

Such principles are translated by the refusal to establish negotiations with or confer assignments that can offend or that are contrary to the fundamental principles that underpin the respect for human dignity and by the commitment not to collaborate with partners, also international ones, who violate such principles, with particular reference to the exploitation of child labour and the safeguarding of the primary guarantees of every worker.

DE NITTIS refuses every form of forced labour and does not tolerate violations of human rights, nor the use of illegitimate workers. The personnel is hired with a regular work contract and no form of illegitimate labour is tolerated.

The personnel of DE NITTIS must always have a respectful conduct towards the people with whom they come into contact on behalf of the company, treating everyone equally and with dignity.

4.3 Honesty, quality, integrity

The quality of the tasks that make the business everyday is an essential value for DE NITTIS SRL. For this reason DE NITTIS SRL expects this from itself, through a process of certified quality, and from its own interlocutors.

DE NITTIS SRL is an integral reality that is founded on the awareness, of the people

who are committed to their own work, that quality and reliability constitute the foundations for a solid and correct development. The credibility of DE NITTIS SRL must be founded on the reputation it earns over time only thanks to wholesome, coherent and qualitatively irreproachable behaviour. Honesty, integrity and quality are closely connected.

4.4 Respect and safeguard of the market and of the competition

For DE NITTIS SRL it is fundamental that the market is characterized as correct and loyal for all the industrial operators, in the spirit as laid down in the article 41 of the Constitution (*Private economic initiative is free. It cannot be carried out in contrast with social utility or in a way that is detrimental to security, freedom, human dignity. The law determines the programmes and the opportune controls so that the public and private economic activity may be guided and coordinated for social purposes*) and by the national and European provisions in this area. The effective market freedom, that guarantees opportunities to participate and find a presence on the market through merit and product quality, can only be ensured by behaviour that conforms to the ethical principles of the present Code.

It is necessary to observe every regulatory law of the market and to collaborate with the authorities that regulate it.

All the prescriptions that are useful to prevent forms of market abuse are to be observed.

DE NITTIS SRL respects every form of legitimate competition, does not participate in unfair competition and is committed to carrying out commercial negotiations with respect for the prerogatives of others, without falsifying data, documents or other information useful for establishing a position with respect to the competition.

Therefore no form of present, kindness or favour is admitted that may be used to acquire favourable treatment in any phase of the commercial activity of DE NITTIS SRL. Such a principle – that allows for no derogations even in those Countries where offering valuable gifts to the commercial partners is accepted behaviour – concerns both gifts promised or offered, and those received, where by the term gift encompasses any type of benefit, or kindness.

DE NITTIS SRL is committed to creating and supplying products and/or services of quality and to competing on the market according to the principles of fair and free competition and transparency, maintaining correct relations with the public, government and administrative institutions, with the citizens and with the third party businesses. Each is expected to operate, in any situation, with integrity, transparency, coherence and equity, conducting with honesty every business relationship.

4.5 Respect and safeguard of industrial property

The company where it is engaged in carrying out new projects that require new patents or trade marks or in anycase the object of safeguards in favour of third parties, will satisfy the requirements of the legislation for the safeguard of industrial property,

trade marks and patents.

4.6 Protection of personal data

DE NITTIS SRL collects, processes and conserves correctly and accurately the personal data of clients, owners of capital, collaborators, employees and of other subjects, *both physical and judicial persons*, of which it comes into possession. In this area, the company is committed to processing such data within the limits and in conformity with the national and European legislation on *privacy*, with specific reference to the Legislative Decree 196/2003 (*privacy code*) and to the European Regulation 679/16 (*General Data Protection Regulation – GDPR*).

All the personnel of DE NITTIS SRL who find themselves, in the area of their work, processing data, sensitive or not, must always proceed according to the aforementioned legislation and the operative instructions given by the company.

DE NITTIS SRL adopts appropriate measures to ensure that the access to telematic and computer data takes place with absolute respect for the current legislation and for the *privacy* of the subjects involved and in such a way as to guarantee the security and confidentiality of the information and to ensure that the processing is carried out by subjects who are expressly authorized to do so, impeding unwanted interference.

5. Conduct criteria in relations with personnel

5.1 Personnel policy

Respecting and valorising people

DE NITTIS SRL recognizes that the human resources constitute a factor of fundamental importance for its own development, for this reason respecting and valorising the people who work in DE NITTIS SRL is a primary value of the company.

DE NITTIS SRL commits itself to implementing all the initiatives that enable the valorising and enhancing of skills, creativity and the active participation of the personnel, to increase the motivation and favour professional growth and realization.

The working environment, inspired by respect, correctness and collaboration, must allow the involvement and the responsabilization of the people, regarding the specific goals to reach and the modalities by which to pursue them.

The administrator, the managers and the employees all commit themselves to an action oriented to efficient cooperation with respect to the satisfaction, in sustainable conditions, of the expectations of all the *stakeholders*.

With this aim they also commit themselves to the constant and concrete assumption of responsibilities connected to their role, with respect to the organizational lines in the relationships between collaborators and between functions, to a harmonic and constructive composition of the differences in goals and skills of which the people working in the business are the carriers, to the safeguarding of a true transparent and

motivating internal communication.

The updating of personal and company knowledge and the development of skills are an essential value for the company.

DE NITTIS SRL recognizes as determining criteria for the development in remuneration and career, work performance, skills and professional potential.

The selection, assumption, training, management, development and remuneration policies are closely linked to criteria of merit and ability, with exclusively professional evaluation, without any discrimination.

DE NITTIS SRL safeguards its employees both in the working conditions, and in the protection of their psycho-physical integrity, and with respect to the moral personality. DE NITTIS SRL commits itself so that all the employees contribute to maintaining a company climate of collaboration and trust, of reciprocal respect for the dignity, honour and reputation of everyone.

The Organization favours forms of flexibility in the organization that help people in carrying out their working activities, in relation to their family, health and personal conditions.

DE NITTIS SRL commits itself to avoiding that the employees fall victim to illegal conditioning and unpleasantness in the area of the working activity, by intervening to prevent injurious and defamatory behaviour.

It is considered an abuse of the position of authority to ask, as an act of duty to those hierarchically superior, for work, personal favours or any behaviour that is a violation to the present Code of Ethics.

DE NITTIS SRL commits itself not to assume or promote personnel indicated by third parties, and in particular by representatives of the Public Administrations, with the single aim of illegally favouring commercial negotiations and contractual relationships.

Sexual molesting in the work place

DE NITTIS SRL commits itself to avoiding and pursuing any form of molesting in the work place.

By molesting it is meant:

- a working environment that is intimidating, hostile, isolating towards one or groups of workers;
- the unjustified interference with the execution of the working activities of others;
- any behaviour that causes harm to the dignity and to the personal and sexual freedom of the workers both men and women.

Abuse of alcoholic substances and drug abuse

DE NITTIS SRL requires that each employee contributes personally to maintaining the working environment respectful of the dignity and the health of all.

It will therefore be considered as knowingly assuming the risk of not respecting such environmental characteristics, while carrying out working activities and in the work place in the case of:

- working under the effects of abuse of alcoholic substances, of drug abuse or of substances of similar effect;
- consuming or giving for whatever reason inebriating substances during the course of the working activity.

DE NITTIS SRL commits itself to favouring the social actions foreseen in this area by the collective contract.

Safeguarding of confidentiality

DE NITTIS SRL safeguards the *privacy* of its employees according to the norms in force in this area, committing itself not to communicate nor to disseminate, except in the case of legal requirements, the relative personal data without firstly asking consent from the interested party. The acquisition, processing and conservation of the said information takes place within specific procedures designed to impede non-authorized people from having access and to guarantee the full respect of the norms of safeguarding of *privacy*.

5.2 Safety and Environment

DE NITTIS SRL recognizes the health and the safety of the workers and safeguarding of the environment as priority objectives, to be maintained on a daily basis with a company policy oriented towards the realization of the necessary investments.

All the employees are expected, in the area of their functions, to participate in the process of preventing risks, to safeguard the environment and to safeguard health and the safety of themselves, colleagues and third parties.

DE NITTIS SRL commits itself to consolidate and disseminate the culture of safety, with an adequate company policy, promoting responsible behaviour by all.

The activities are managed in full observance of the current legislation in the area of prevention and protection from injury and of safety at work.

For the Organization the respect for the environment represents a basic value for the satisfaction of one of the primary needs of the single citizen and of the entire community: to create better conditions for the future of the new generations.

Recognizing itself in the spirit of what is provided for in the article 9 of the Constitution, (*the Republic promotes the development of culture and scientific and technical research. It safeguards the countryside and the historic and artistic patrimony of the Nation*).

DE NITTIS SRL puts safeguarding the environment as a precondition in the choices

of the technologies, the programmes and company strategies, preventing pollution of every kind and evaluating the environmental impact of the services offered. All the productive processes are carried out in full respect of the applicable environmental legislation and regulation. For the company a virtuous activity is one that does not limit itself to doing the minimum to satisfy the legal requirements but that faces the most delicate areas at risk with the wish to innovate and find solutions that are always respectful of the environment.

The Organization recognizes the value of the territory in which it operates and assumes the commitment to preserve its environment.

DE NITTIS SRL, furthermore, believes in the value of industrial and technological research that has as a goal the improvement in the quality of the environment and of life, aware that its activity is also at the service of the collectivity and common good.

5.3 Duties of the employees

DE NITTIS SRL employees must not:

- ask for or accept promises or sums of money or goods of any kind or value, or other benefits, facilitations or services of other kinds from anyone, for proposing or determining the recruitment, or the transfer or the promotion of employees;
- use human resources or company property, nor use or disseminate reserved information, for uses or interests that are not of the company;
- leave declarations or supply information about the company, unless it is their function, or they have been generally or specifically authorized, or are expected to do so by law;
- conduct business, for themselves or for third parties, in competition with the company.

The employees of DE NITTIS SRL must immediately inform in written form their superior and the Personnel Management of any financial or personal interest, direct or indirect, in the activity of another company that is or may be in competition with their own organization.

The communication must take place at the moment of the knowledge of the present Code of Ethics, or at the act of assumption, or at the moment in which such interest in the competition arises.

The employees must communicate immediately in written form to their superior and to the Personnel Management if they conduct another working activity on a stable basis.

The violation of the norms of the present Section by the employees of the DE NITTIS SRL implicate the consequences as foreseen by the law, by the contract and by the company disciplinary code.

5.4 Conflicting interests

Activities or situations that implicate or may implicate, even only potentially, a conflict between the individual interests and those of DE NITTIS SRL must be avoided. All the collaborators must abstain from taking advantage from their position within the Organization to favour themselves or third parties to the detriment or disadvantage of the company.

Should there be a situation of conflicting interests, even potentially, each subject involved is expected to abstain from having such conflicting conduct and must inform without delay their superiors or referents of the situations or activities in which there could be conflicting interests with DE NITTIS SRL, from the part of those very persons or their kin, or in any other case in which recur relevant reasons of convenience.

The following situations for example, but not only these, may determine conflicting interests:

- economic and financial interests of the employee and /or of his family, or acquaintances, in activities of suppliers, clients and competitors;
- the use of their position in the company or of the information acquired in relation to their working activity in such a way that a conflict could be created between their personal interests and those of the company;
- carrying out work, of any type, for clients, suppliers, competitors;
- running their own business in competition with activities of the company, also through family members;
- the acceptance of money, favours or utilities by people or third parties that are or intend to go into business with DE NITTIS SRL.

5.5 Use of company property

Every collaborator of the DE NITTIS SRL is expected to operate with diligence to safeguard the company property, through responsible behaviour and in line with the operative procedures for the regulation of the use, documenting with precision its use.

In particular collaborators must:

- use scrupulously and sparingly the property entrusted to them;
- avoid inappropriate use of the company property, that may cause damage or the reduction of efficiency, or that is however in contrast with the interests of the company;
- store the resources adequately.

6. Conduct criteria in relations with third parties

The behaviour of the employees of DE NITTIS SRL in business relations must be based on loyalty, honesty, correctness, transparency, efficiency.

It is absolutely prohibited to partake in :

- practices of corruption;
- illegitimate favours;

- collusive behaviour;
- asking for, directly and/or indirectly through third parties, personal and career advantages for oneself or for others.

The employees of DE NITTIS SRL have the right to participate in investments, business, or other activities outside those carried out in the interests of the DE NITTIS SRL on condition that these are activities consented by law and compatible with the obligations assumed as an employee.

Employees and collaborators are forbidden from making or accepting gifts that can influence the service received or carried out. In particular, any complimentary gifts must not exceed the normal commercial and relational practices. They must always be necessarily authorized by the relative company function and adequately documented. The same rules and caution must operate in case of invitations to lunches, business trips and events in general. It is furthermore forbidden to accept or implement, for oneself or for others recommendations or suggestions, that can cause advantages for oneself, or disadvantages for DE NITTIS SRL or for third parties; all the recipients of the present Code are therefore expected to refuse, and not to implement, promises of offers of money or other benefits. In particular, it is forbidden to pay money, or offer economic advantages or other types of benefits to subjects of the Public Administration, with the goal of obtaining orders or other advantages, for oneself or for DE NITTIS SRL and in any case it is forbidden to make any form of gift to employees of Italian or foreign Public Administrations, or to their family members, that may influence judgement with the aim of obtaining more favourable treatment or services or advantages of various types. The term gift meaning any type of benefit or kindness. The above must not be eluded by using third parties. Should a person of the company receive, from a component of the Public Administration, explicit requests or pressure, they must immediately inform their superior in the hierarchy or the person they are expected to refer to, for the adoption of the opportune actions, as well as to the Supervisory Authorities.

Every employee must:

- observe the principles and the internal procedures for the selection and the management of the relationship with external collaborators;
- select exclusively qualified people and businesses;
- refer promptly to their superior or to the relative functions doubts or news relative to possible violations of the Code of Ethics by external collaborators.

The employees must ask external collaborators to keep to the norms of the Code of Ethics.

The violations of the present Section by the employees of the DE NITTIS SRL

constitute a break down in the relationship of trust with the company, with the consequences as provided for by the law, the contract and by the company disciplinary code.

6.1 Relationships with clients

The commitments of the company toward the clients/citizens are defined clearly and transparently.

All the employees are expected to treat clients with respect and kindness, to answer their questions, to help them in the exercising of their rights and in the fulfilment of obligations, satisfying the needs and expectations and anticipating future needs.

In the relations with clients, the employees of DE NITTIS SRL are obliged to:

- observe the internal procedures for the management of the relations with clients;
- supply, with efficiency services of high quality, contributing to continuous improvement;
- supply accurate, exhaustive and true information.

It is forbidden to promise, correspond or offer, directly or indirectly in the different forms of contributions or liberalities (e.g.: sponsorizations, work, consultancy, advertising), payments or material benefits (sums of money or goods) of any entity or value to the clients, to promote or favour the interests of DE NITTIS SRL.

Free gifts or acts of kindness both commercial or of hospitality are allowed only if of modest value and in any case such as not to compromise the reputation of one of the parties and must always be authorized by the company function to which it pertains and adequately documented.

Any employee who receives explicit or implicit requests for benefits must immediately suspend any business relationship with the petitioner and inform their superior who will report it to the Personnel Management.

In participating in procedures of competition matching, DE NITTIS SRL evaluates carefully the congruity and the feasibility of the services required, with particular regard to the regulative, technical and economic conditions.

In relations with clients DE NITTIS SRL guarantees correctness and clarity in commercial negotiations and in the acceptance of contractual obligations, as well as the faithful and diligent execution of the same.

6.2 Relations with suppliers and external collaborators

In the relations with suppliers, employees of DE NITTIS SRL are obliged to observe the internal procedures for the selection and the management of the relations with the suppliers, ensuring the documentation of the entire procedure of selection and

purchase, so as to enable the reconstruction of every operation, and in any case:

- adopt selection criteria inspired by the principles of correctness, transparency, good faith, impartiality, competitiveness and efficiency;
- recognize the equal opportunities of the suppliers, verifying the technical and professional suitability first and foremost;
- observe scrupulously the contractual conditions provided, maintaining the relations with the suppliers according to good commercial customs.

The employee must always promptly bring to the attention of their superior and of the competent company structure problems arisen with the suppliers, so as to evaluate the consequences on the system of DE NITTIS SRL of appraising the suppliers.

The employee must not pursue any personal interest, contrary to the principles of the Code and to the laws, regulations, company procedures.

It is forbidden to accept promises or sums of money or goods of any entity or value, even indirectly under different forms of freedoms or benefits, from any supplier, directed to promote or favour the interests of a supplier.

Complimentary gifts or acts of kindness both commercial or of hospitality are allowed only if of modest value and in any case such as not to compromise the reputation of one of the parties and must always be duly authorized by the company function to which it pertains and adequately documented.

Any employee who receives explicit or implicit requests for benefits must immediately suspend any business relationship with the petitioner and inform their superior.

Every employee must immediately communicate in written form to their superior and to the Personnel Management any financial or personal interest, direct or indirect, in the activity of the supplier.

In particular, they must make known any relationship present or past of a financial, business, professional, family or social nature such as could influence the impartiality of their conduct towards the supplier.

6.3 Relations with the Public Institutions

Relations between DE NITTIS SRL and Public boards and Public Administrations stem from the awareness that, as stated in the article 98 of the Constitution (*Civil servants are at the exclusive service of the Nation. If they are members of Parliament, they cannot obtain promotions if not for seniority. Limitations can be established by law for magistrates, regular soldiers in active service, officers and agents of the police, diplomatic and consulate representatives abroad, to the right to join political parties*), civil servants are at the exclusive service of the Nation and of general interests.

In every relationship with the Public Administration, the observance of the law, of the regulations, also local ones, of the rules and directives that regulate the above-

mentioned relationships, with particular reference to the environmental and energy legislation, are fundamental.

DE NITTIS SRL collaborates actively and fully with the Public Authorities, pursues the goals indicated by the Public Institutions of reference and collaborates efficiently with the organisms of the same proposed for the activity of regulating and checking the local public services. The company pursues such goals combining them with its own mission and with the need for organizational and management autonomy typical of any economic operator.

The principles that inform and mould the relations with the Public Administration are and must be those of transparency, correctness and honesty. The relational dimension with the Public boards and the authorities connected to them must be characterized by the duty, understood as an absolute obligation, to maintain behaviour in line with the cited ethical principles and with the reputation of the company.

Contributions, subsidies or financings obtained from the European Union, from the State or from other Public Body, even if of modest value and/or amount, must be used only and exclusively for the finalities for which they have been requested or granted.

All the employees of DE NITTIS SRL are expected to give maximum collaboration in case of relations with the Public Institutions. The relations with public officials are reserved exclusively for the specific company functions proposed to do so. The data and the information transmitted to the Public Institutions must be accurate, complete and truthful.

Any employee who receives explicit or implicit requests for benefits must immediately suspend any business relationship with the petitioner and inform their superior, who will report it to the top management of their company.

6.4 Relations with the Organs of Justice and Public Supervisory Authorities

DE NITTIS SRL has the duty, through its collaborators, to meet the requests of the organs of justice with true declarations without omissions, supplying all the information necessary for the verification of the facts.

The company's relationship with the Public Supervisory Authorities and the Organs of Justice are based on maximum collaboration and to that end it commits itself to responding promptly, completely and truthfully to the requests of such Organs and Authorities, supplying all the necessary information for the verification of the facts.

Where it is necessary to supply declarations or documentation in the area of pre-trial investigations existing with Institutions and/or Public Supervisory Authorities, the principles of truth, completeness and transparency must be applied.

6.5 Relations with political Organizations and Trade Unions

DE NITTIS SRL does not allocate contributions, directly or indirectly and under any form, to parties, movements, committees and political and Trade Union organizations, to their representatives and candidates, except those in compliance with specific

regulations.

6.6 Confidentiality and protection of personal data

Every employee of DE NITTIS SRL must guarantee the necessary confidentiality relative to all data, news and information learned of by reason of their functions.

In general the employees and all the external collaborators are expected to respect the pledge of confidentiality for all the information that constitutes the company's patrimony (may they be personal/sensitive data, intellectual property or the financial situation) that they may process every day or only occasionally. The employees and/or collaborators are expected to adhere to such a principle rigorously, even after the working relationship or collaboration has ceased, for whatever reason, within the time limits stipulated by the law or by the contract.

6.7 External communication and promotional activities

DE NITTIS SRL invests in promotional and communication activities with the aim of making its business known. The information towards the outside must be true, complete and transparent.

The relations with the instruments of communication must be based on the respect for the correct right to information and are reserved exclusively for the responsibilities and for the company functions to which they are delegated. All information or communication must be respectful of the honour and confidentiality of the individuals.

The employees of DE NITTIS SRL cannot supply information to representatives of the mass media nor commit themselves to supplying it without authorization from the competent company function.

The Employees cannot offer payments, gifts or other advantages with the aim of influencing the professional activity of the mass media.

The employees called to supply to the outside news regarding the company aims, activities, and results, through the participation in public events, conventions, congresses, seminars or the publishing of articles, essays and publications in general, are expected to obtain the authorization from the top management of the organizational structure to which they belong about the text, the prepared reports and the lines of communication, agreeing and verifying the contents with the relevant company function .

For the purposes of communication and promotion DE NITTIS SRL is willing to supply contributions and sponsorship, in respect of definite procedures, observing the ethical principles contained in the present code and provided for by the law, giving it adequate publicity, to sustain initiatives proposed by public and private bodies and by non-profit making associations. The sponsorship and contributions can regard events and initiatives of social, cultural, sporting and artistic character; they can also be intended to create events, studies, research, conventions and

seminars having themes that are of interest to the company.

In no case must a contribution or sponsorship have the aim of obtaining favourable treatment that is illicit or not opportune, as that is contrary to the principles of the present Code.

7. Accountancy and internal controls

DE NITTIS SRL guarantees a full observance of the principles of transparency and truthfulness in every company operation and in particular regarding the management of financial flows, keeping of accounts. So as to guarantee the reliability of the administrative-accountancy system and the correct representation of the economic, patrimonial and financial situation of DE NITTIS SRL in the internal documents, the balance sheet and in the other social communications, as well as in the information for the investors, the public and the Supervisory Authorities, the accountancy recordings must be transparent and the information must be true, accurate and complete, with respect to the most suitable accountancy and financial procedures in order to avoid irregularities, illegitimacies and violations of the specific regulations, with particular reference to provisions regarding money laundering, illegal car dealing, receiving and using stolen money or goods of doubtful origins.

Furthermore the company guarantees the observance of fiscal regulations and fulfilments and the observance of the provisions regarding the prohibitions or the communications of commercial operations with operators who work in the countries included on the so-called “Black list”, meaning the countries with a privileged fiscal regime.

All the employees of DE NITTIS SRL are expected to collaborate so that the management data is correctly and promptly represented in the accounts.

Every book entry must reflect exactly what appears in the supporting documentation.

The employees of the DE NITTIS SRL who discover omissions, falsifications or carelessness regarding the book entries or the supporting documentation, must immediately communicate it to their superior who will report it to the Director responsible for the drafting of the accountancy and company documents.

The existence of an adequate system of internal controls is a value recognized by DE NITTIS SRL for the contribution that the controls make to improving the efficiency of the company.

By internal controls it is meant all the instruments used to guide, manage and verify the company activities, to ensure the observance of the laws and of the company procedures, the realization of the company interests and to supply accurate and complete accountancy and financial data.

All the employees of DE NITTIS SRL, in the area of their functions, are responsible for the definition and the correct functioning of the company system of control.

No employee may use the goods or resources of DE NITTIS SRL inappropriately or

permit others to do so.

The *Internal Auditing* and the auditing companies have free access to data, documentation and information useful for carrying out activities of control and auditing.