

COMPANY	DOCUMENT	REFERENCES
<i>tecniwell</i>	CODE OF ETHICS	Rev. 01.00 Classification: Public

CODE OF ETHICS

TECNIWELL S.r.l.

Year 2024

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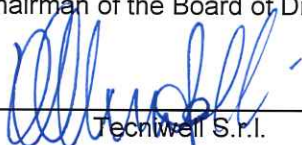
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1. PURPOSE OF THE DOCUMENT

This document describes the Code of Ethics of Tecniwell S.r.l.

Rev.	Revision date	Modifications
01.00	21/11/2024	Creation of a new version

Chairman of the Board of Directors



Tecniwell S.r.l.

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2. INTRODUCTION

2.1. GENERAL PRINCIPLES

This Code expresses the commitments and ethical responsibilities in the conduct of business and company activities and defines the set of values and principles, as well as the lines of conduct to be assumed by the people of Tecniwell S.r.l. (hereinafter "Tecniwell"), whether directors, employees or collaborators. Tecniwell aims to create sustainable value shared with all its stakeholders, internal and external, by innovating and pursuing excellence along the entire value chain of the businesses in which it operates.

2.2. STAKEHOLDER DIALOGUE

Tecniwell aspires to maintain and develop the relationship of trust with its stakeholders, i.e. with those categories of individuals, groups or institutions whose contribution is required to achieve Tecniwell's mission or who otherwise have an interest at stake in its pursuit. Stakeholders are those who have a direct or indirect interest in the company's activities such as companies and trade associations, customers, national and international institutions, civil society and local communities, the media, employees, suppliers, agents, contractors as well as organisations and institutions representing them, partners understood as natural or legal persons who have an interest in Tecniwell for the joint development of new projects.

2.3. UNETHICAL BEHAVIOUR

In the conduct of business, unethical behaviour undermines the relationship of trust between Tecniwell

and its stakeholders. Unethical, and conducive to hostile attitudes towards the company, is the behaviour of anyone, whether an individual or an organisation, who seeks to appropriate the benefits of the collaboration of others by exploiting positions of strength.

2.4. REPUTATION AND FIDUCIARY DUTIES

A good reputation is an essential intangible resource that externally fosters investment, a lasting relationship with customers, the attraction of top talent, the trust of suppliers, reliability towards creditors, and internally is nurtured by a collaborative climate and a working approach open to the inclusion of all diversity. The Code of Ethics clarifies Tecniwell's particular duties towards stakeholders (fiduciary duties) and its effective observance is essential to ensure Tecniwell's reputation.

This Code of Ethics therefore consists of three main parts:

- the **general principles** on stakeholder relations, which define in an abstract way the reference values in Tecniwell's activities;
- the **criteria of conduct** towards each class of stakeholder, which specifically provide the guidelines and standards that Tecniwell people are required to adhere to in order to prevent the risk of unethical behaviour;
- the **implementation methods**, which describe the control system for compliance with the Code of Ethics and for its continuous improvement.

2.5. VALIDITY AND APPLICATION

The principles and provisions of this Code of Ethics are addressed to the members of the Board of Directors, the Auditor and other control and supervisory bodies of Tecniwell as well as to the managers, employees and collaborators linked to Tecniwell by contractual relationships of any kind,

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even occasional and/or only temporary. Furthermore, Tecniwell requires suppliers, agents and partners to conduct themselves in line with the general principles of this Code. The Code of Ethics is valid in all countries in which Tecniwell operates, taking into account their cultural, social and economic diversity.

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3. GENERAL PRINCIPLES

3.1. IMPARTIALITY AND NON-DISCRIMINATION

In the decisions that affect its economic relations and relationships with its stakeholders (relations with customers, personnel management or work organisation, management of suppliers, agents and partners, relations with the surrounding community and the institutions that represent it), Tecniwell avoids any discrimination based on gender, age, disability, nationality, sexual orientation, ethnicity, religion, opinions, policies and any other form of diversity.

3.2. HONESTY

Within the scope of their professional activity, Tecniwell's people are required to diligently comply with applicable laws, the Code of Ethics, policies, procedures, operating instructions and internal regulations. Under no circumstances may the pursuit of Tecniwell's interest justify dishonest conduct.

3.3. FAIRNESS IN THE CASE OF POTENTIAL CONFLICTS OF INTEREST

In the conduct of any activity, situations must be avoided where the persons involved in the transactions are, or may even just appear to be, in conflict of interest. This means both the actual or apparent situation in which the secondary interest (economic, financial, family or other) of the person in Tecniwell interferes or tends to interfere with the ability to impartially make decisions in the best interests of the company and to carry out the functions and responsibilities held, and the case in which representatives of customers, suppliers or public institutions act in their relations with Tecniwell in a manner contrary to the fiduciary duties associated with their position.

By way of example but not limited to, the following situations may give rise to conflicts of interest:

- having economic and financial interests (significant ownership of shares, professional appointments, etc.), including through family members, with customers, suppliers or competitors;
- performing work, including by family members, for customers, suppliers or competitors;
- accept money, gifts or favours of any kind from persons, companies or entities that are or intend to enter into business relations with Tecniwell;
- use one's position in the company or information acquired in one's work in such a way that may create a conflict between one's own interests and those of the company.

3.4. CONFIDENTIALITY

Tecniwell ensures the confidentiality of the information in its possession and refrains from seeking the confidential data of others, except in the case of express authorisation and in any case in accordance with the legal regulations in force. In addition, Tecniwell persons are obliged not to use confidential information for purposes unrelated to the conduct of their business. Tecniwell complies with the indications provided by the company policies and the national and European data protection regulations, in order to guarantee full respect for the privacy of all the individuals with whom it interacts.

3.5. VALUE OF PEOPLE

Tecniwell focuses on its people as an enabling factor to thrive in an ever-changing world. For this reason, Tecniwell protects and enhances the value of people working in the company by promoting continuous learning and professional development. In particular, Tecniwell guarantees that its actions are not detrimental to the dignity and autonomy of individuals, and that its work organisation choices safeguard the value of individuals as well as the reconciliation of work and private life also

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through the promotion of flexible working arrangements, the activation of corporate welfare tools and activities aimed at improving the working relationship (e.g. teambuilding).

3.6. INTEGRITY OF PEOPLE

Tecniwell guarantees the physical and moral integrity of its people, working conditions that respect personal dignity and individual specificities, and a safe and healthy working environment. In addition, it acts to ensure that no incidents of harassment, intimidation, bullying or stalking occur in the work environment. Requests or threats aimed at inducing persons to act against the law, the Code of Ethics or internal policies, or to engage in behaviour detrimental to individual beliefs and preferences are not tolerated. Physical, verbal, visual or psychological harassment that creates a denigrating, hostile, humiliating, intimidating, offensive or unsafe working environment is not tolerated. A working environment is considered to be any place where work activity is carried out. In particular, harassment relating to the sexual sphere and behaviour that may disturb individual sensitivities (e.g. allusions and explicit comments or advances) are not tolerated. Disparities of treatment are not considered discrimination if they are justified or justifiable on the basis of objective criteria.

3.7. EQUITY

In entering into and managing contractual relationships involving the establishment of labour relations, Tecniwell undertakes to ensure fairness and correctness by avoiding any abuse of authority.

3.8. DILIGENCE AND ACCURACY IN THE ACTIVITIES AND EXECUTION OF CONTRACTS

Contracts and work assignments must be performed as consciously agreed by the parties. Tecniwell undertakes not to exploit conditions of ignorance or incapacity of its counterparts. It must be avoided that, in existing relations, anyone acting in the name and on behalf of Tecniwell tries to take advantage of contractual gaps, or unforeseen events, to renegotiate the contract for the sole purpose of exploiting the position of dependence or weakness in which the interlocutor has found him/herself. Tecniwell's people are obliged to provide complete, transparent, comprehensible and accurate information, so that, when dealing with stakeholders, they are able to make autonomous decisions in full knowledge of the interests involved, the alternatives and the relevant consequences. In particular, in the formulation of any contracts, Tecniwell shall take care to specify to the contracting party the conduct to be adopted in all foreseen circumstances, in a clear and comprehensible manner.

3.9. QUALITY OF SERVICES AND PRODUCTS

Tecniwell orients its activities towards the satisfaction and protection of its customers by listening to requests that can help improve the quality of its products and services. For this reason, Tecniwell focuses its research, development and marketing activities on high quality standards for its services and products. Tecniwell has an ISO9001-certified quality management system.

3.10. FAIR COMPETITION

Tecniwell intends to protect the value of fair competition by refraining from collusive behaviour and is committed to complying with anti-corruption laws and regulations in all areas of operation. Tecniwell intends to compete ethically, avoiding dishonest or deceptive practices and respecting the intellectual property rights and confidentiality of competitors' data.

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3.11. RESPONSIBILITY TOWARDS THE COMMUNITY

Tecniwell is aware of the influence, even indirect, that its activities can have on individual conditions, economic and social development and the general welfare of the community, as well as the importance of social relevance in the communities in which it operates. For this reason, Tecniwell intends to conduct its investments in a sustainable manner, respecting local and national communities and also promoting initiatives of cultural and social value such as scholarships, donations and charitable works to associations and educational institutions, sponsorship of village festivals and local sports clubs.

3.12. ENVIRONMENTAL PROTECTION

The environment is a primary asset that Tecniwell is committed to safeguarding; to this end, it plans its activities by seeking a balance between economic initiatives and unavoidable environmental needs, taking into account the rights of future generations. Tecniwell is therefore committed to improving the environmental and landscape impact of its activities, as well as preventing risks to populations and the environment, not only in compliance with current legislation, but also taking into account the development of scientific research and the best experiences in the field. Tecniwell is committed to ensuring the greatest possible use of clean and affordable energy, promoting the decarbonisation of production, the development of renewable energy and the electrification of consumption.


Tecniwell's strategy is geared towards investments and activities that meet the principles of sustainable development; in particular:

- Actions aimed at the elimination of plastic;
- Commitment to selective waste collection and disposal;
- Use of LED-based lighting technologies;
- Launch of a range of electrically powered products to replace diesel-powered thermal engines.

3.13. DATA PROTECTION AND CYBERSECURITY

Tecniwell adopts high standards of security and management of the personal data of its employees, customers, suppliers and stakeholders. Tecniwell guarantees respect for the rights of data subjects and adopts ad hoc policies, operating instructions and technologies to improve the security of its network and information systems. Privacy management is part of the business processes, as is cyber risk analysis and the protection of personal data, even of a special nature. Stakeholder information is treated by Tecniwell with full respect for the confidentiality and privacy of those concerned. To this end, specific information protection policies and procedures are applied and constantly updated. In particular, Tecniwell ensures that the processing of personal data pursues the following principles:

- Lawfulness, fairness and transparency means that personal data are processed lawfully, correctly and transparently;
- Purpose limitation, data are only acquired and processed within specific procedures, and they are stored and archived in a way that prevents unauthorised others from gaining knowledge of them;
- Data minimisation, only data that are necessary and appropriate for the purposes in direct connection with the functions and responsibilities held are acquired and processed;
- Accuracy, data are accurate and, if necessary, updated;
- Storage limitation, data are stored for a period defined in relation to the type of processing;
- Integrity and confidentiality, Tecniwell adopts appropriate and preventive security measures for all databases in which personal data and strategic business information are collected and

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stored, in order to avoid the risks of destruction and loss or unauthorised access to computer systems or unauthorised processing.

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4. CONDUCT CRITERIA

4.1. GIFTS, GIVEAWAYS AND BENEFITS

No form of gift is allowed that may even be construed as exceeding normal business or courtesy practices or otherwise aimed at acquiring favourable treatment in the conduct of any activity related to Tecniwell. In particular, any form of gift to Italian and foreign public officials, auditors, directors of Tecniwell, members of control and supervisory bodies, or their relatives, that could influence independence of judgement or induce them to secure any advantage, is prohibited. This rule, which does not allow for exceptions even in those countries where offering valuable gifts to business partners is customary, concerns both gifts promised or offered and those received; it should be noted that a gift means any type of benefit (promises of economic advantages, favours, recommendations, free participation in events, hospitality, promise of a job offer, etc.). In any case, Tecniwell abstains from practices that are not permitted by law, business practices or codes of ethics – if known – of the companies or entities with which it has dealings. Tecniwell's giveaways are characterised by being aimed at promoting Tecniwell's brand image. Gifts offered and received must be managed and authorised in accordance with company procedures and must be adequately documented.

4.2. EXTERNAL COMMUNICATIONS

Tecniwell's communication with its stakeholders is characterised by respect for the right to information; under no circumstances may false or biased news or comments be divulged. Every communication activity respects the laws, rules, and practices of professional conduct, and is carried out with clarity, transparency and timeliness, safeguarding, trade secrets. Any form of media pressure or favouritism is prohibited.

4.3. PERSONNEL SELECTION

Personnel to be recruited are assessed on the basis of the correspondence of the candidates' profiles with those expected and with the company's needs, respecting equal opportunities for all forms of diversity. The information requested is strictly related to the verification of the aspects envisaged by the professional and psycho-aptitude profile, while respecting the candidate's privacy and opinions. The Personnel Department, within the limits of the information available, takes appropriate measures to avoid any form of discrimination, nepotism, or forms of patronage in the selection and recruitment communication stages.

4.4. ESTABLISHMENT OF THE EMPLOYMENT RELATIONSHIP

The personnel is employed under a regular employment contract. No form of irregular work is tolerated. Upon establishment of the employment relationship, each employee receives accurate information on:

- characteristics of the function and tasks to be performed;
- normative and salary elements as regulated by the national collective labour agreement;
- rules and procedures to be adopted in order to avoid possible health risks associated with the work activity and in order to comply with legislation on the processing of personal data.

This information is presented to the employee in such a way that acceptance of the assignment is based on an effective understanding.

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4.5. PEOPLE MANAGEMENT

Tecniwell ensures equal opportunities and non-discrimination in people management by valuing the unique contribution of each individual. In the context of people management and development processes (e.g. in the case of promotion or transfer), as well as in the selection phase, decisions made are based on the correspondence between expected and possessed profiles and/or on merit considerations (e.g. allocation of incentives based on results achieved). Access to roles and assignments is also established in consideration of skills and abilities, and, compatibly with organisational needs, those forms of flexibility in the organisation of work that facilitate the management of parental status and family care and assistance loads are favoured. The evaluation of persons is carried out in a broad manner involving the managers, the Personnel Department, as far as possible, the persons who have come into contact with the evaluated person. Within the limits of the information available and the protection of privacy, the Personnel Department works to prevent any form of favouritism.

Continuous learning

Managers utilise and fully valorise all the professional skills present in the organisation by activating the available levers to foster people's development and growth. Tecniwell considers training to be a continuous stimulus for the self-learning of the skills and knowledge needed to respond to the different professions present in Tecniwell and constantly evolving. Tecniwell encourages the individual's ability to undertake training that respects their needs, passions and aptitudes and helps people develop their potential, which varies from individual to individual.

Work time management

Each manager is obliged to value the working time of employees by requiring performance consistent with the performance of their duties and work organisation plans. It constitutes an abuse of authority to request, as a due act from a hierarchical superior, services, personal favours or any behaviour that constitutes a violation of this Code of Ethics. People's involvement is essential to the realisation of the company's objectives and takes the form of active, collaborative participation based on independent judgement. The process of formulating final decisions takes into account the various points of view in a way that is compatible with business needs.

Accessibility

Tecniwell is committed to the creation of inclusive work environments with a focus on the physical accessibility of workplaces, the digital accessibility of information, documents and communications, and the specific needs of assistive work tools.

Flexibility and workplaces

Tecniwell favours flexible ways of carrying out work, ensuring equal opportunities for contribution and fairness in the valorisation of people on the basis of the results achieved and regardless of the way the work is carried out.

Well-being

Tecniwell pays attention to the promotion of work-life integration-oriented behaviour and is actively committed to fostering personal and organisational well-being as enabling factors for people's involvement and innovative potential.

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4.6. HEALTH AND SAFETY

Tecniwell considers the health, safety and psychophysical integrity of people to be the most valuable asset to be protected at all times of life, at work as well as at home and during leisure time, and is committed to developing, consolidating and disseminating a solid safety culture throughout its corporate perimeter. Tecniwell's aim is to ensure a working environment free of health and safety hazards, to protect its own people, and to constantly seek the necessary synergies also with suppliers, agents, companies, partners and customers involved in its business.

In particular, the company undertakes to:

- eliminate or, when not possible, reduce risks to health, safety and the environment;
- identify risks that cannot be avoided and plan an appropriate prevention and protection programme, as well as control of possible accidents and/or environmental pollution;
- adapt work equipment, facilities and workplaces to the relevant legal provisions;
- provide appropriate personal and collective protective equipment to workers;
- give appropriate instructions to workers and provide periodic training updates on health and safety and environmental protection;
- monitor the application of the prevention and protection measures adopted and the behaviour of workers, in order to prevent accidents, occupational diseases and environmental incidents;
- comply with the relevant legal obligations concerning the protection of workers' health and safety and the protection of the environment.
- the assessment of all health and safety risks and the adoption of a systematic approach to eliminate them at source or, when this is not possible, to minimise them;
- the adoption of the best technologies and working methods geared towards continuous improvement;
- the adoption of an information and training programme for workers.


Similarly, workers must ensure compliance with the following rules:

- adopt safe behaviour at work and with care for the protection of the environment, i.e. operate in compliance with company regulations, procedures, instructions, prevention rules in general and this Code of Ethics;
- avoid behaviour that is dangerous to oneself or others or to the environment itself;
- comply with orders given by hierarchical superiors or the Employer;
- immediately report to superiors any anomaly, criticality or other dangerous situation of which they become aware during work;
- comply with assigned tasks and operational assignments;
- cooperate as closely as possible with the activities and instructions of the Prevention and Protection Service;
- participate with attention and involvement in organised training activities;
- cooperate, with responsible behaviour and in compliance with the company rules, in the event of an alarm for any emergency situation;
- undergo the required health surveillance;
- collaborating with the responsible figures to achieve prevention objectives.

Collaborators, suppliers, agents shall also ensure compliance with the following rules:

- adopt safe behaviour during their activities, i.e. operate in compliance with company regulations, instructions received, prevention rules in general and this Code of Ethics;
- respect company signs;
- comply with the contractual conditions governing the relationship between the parties;
- in the case of contracts, works or supply contracts, comply with the prevention guidelines resulting from cooperation and coordination activities between the parties.

Tecniwell also strives for the continuous improvement of the efficiency of company structures and processes that contribute to the continuity of the services provided.

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4.7. DUTIES OF PERSONS

Individuals must act loyally in order to comply with the obligations entered into in the employment contract and the provisions of the Code of Ethics, ensuring the required performance, and are required to report, through the appropriate channels, any situations that they consider to constitute violations.

The Code forms an integral part of the regulations of the employment relationship. Compliance with the rules of the Code must be considered an essential part of the obligations of Tecniwell employees. Violation of the rules of the Code may constitute a breach of the primary obligations of the employment relationship or a disciplinary offence, with all legal consequences, including with regard to the preservation of the employment relationship, and may lead to actions for compensation for damages caused by the same violation. For recipients who are not employees, compliance with the Code is an essential prerequisite for the continuation of the existing professional/collaborative relationship with Tecniwell.

4.8. USE OF COMPANY ASSETS

Each person at Tecniwell is obliged to work diligently to protect the company's assets, through responsible behaviour and in line with the operating procedures drawn up to regulate their use, accurately documenting their use.

In particular, each person must:

- use the assets entrusted to him/her scrupulously and sparingly;
- avoid improper use of company assets that may cause damage or reduce efficiency, or otherwise be contrary to the interests of the company.

Each person is responsible for the protection of the resources entrusted to him/her and has a duty to promptly inform the appropriate units of any threats or events detrimental to Tecniwell. Tecniwell reserves the right to prevent the misuse of its assets and infrastructure through the use of accounting, reporting, financial control and risk analysis and prevention systems, IT security systems, subject to compliance with the provisions of the laws in force (privacy law, workers' statute, etc.).

With regard to computer applications, each person is required to:

- scrupulously adopt the provisions of the company's security policies so as not to compromise the functionality and protection of information systems;
- not to send threatening and insulting e-mail messages, not to use disrespectful language, not to make inappropriate comments that may cause offence to the person and/or damage the company image;
- not surf websites with indecent and offensive content;
- operate on personal social media (LinkedIn, Instagram, Facebook, X, WhattApp, etc.) in a measured and common-sense manner, carefully avoiding giving, directly or indirectly, a non-positive image of the company, even representing it in an unfair and improper manner, and jeopardising the privacy of colleagues and anyone connected with the company;
- avoid loading borrowed or unauthorised software onto company systems. Do not make unauthorised copies of company data and licensed programmes either for your own use or for use by third parties.

In particular, Tecniwell prohibits any use of computer systems that may constitute a violation of the laws in force, as well as an offence against the freedom, integrity and dignity of persons.

The use, even unintentional, of these assets for any purpose outside the company's business may cause serious damage (economic, image, competitiveness, etc.) to Tecniwell, with the aggravating circumstance that improper use may result in potential criminal and administrative sanctions for the company itself for any wrongdoing, and may lead to the need to take disciplinary measures against the recipients.

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4.9. CRITERIA OF CONDUCT IN RELATIONS WITH SUPPLIERS, AGENTS AND PARTNERS

Purchasing processes are marked by the pursuit of maximum competitive advantage for Tecniwell, the granting of equal opportunities for each supplier; they are also based on pre-contractual and contractual conduct oriented towards indispensable and mutual loyalty, transparency and cooperation. Suppliers' performance, in addition to ensuring the necessary quality standards, must go hand in hand with a commitment to adopt best practices in terms of human rights and working conditions, occupational health and safety, environmental responsibility and respect for privacy. In particular, the Tecniwell people in charge of these processes are required to:

- not preclude anyone meeting the requirements from competing for contracts, adopting objective and transparent criteria in the selection of the shortlist of candidates;
- ensure sufficient competition with an adequate number of companies in each tender.

In any case, in the event that the supplier, in the performance of its activities for Tecniwell, adopts conduct that is not in line with the general principles of this Code of Ethics, Tecniwell shall be entitled to take appropriate measures up to and including precluding any further opportunities for cooperation.

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5. METHODS OF IMPLEMENTATION

5.1. TASKS RELATED TO THE IMPLEMENTATION OF THE CODE OF ETHICS

The following tasks are assigned to the Personnel Department:

- verifying the application of and compliance with the Code of Ethics through an analysis and assessment of the internal control system overseeing business processes with a significant impact on corporate ethics;
- monitor initiatives to disseminate knowledge and understanding of the Code of Ethics;
- receive and analyse reports of violations of the Code of Ethics.

These activities are carried out with the support of the corporate functions concerned, having free access to all documentation deemed useful.

5.2. COMMUNICATION AND TRAINING

The Code of Ethics is brought to the attention of internal and external stakeholders by means of appropriate communication activities (e.g. delivery of a copy of the Code to all persons, dedicated sections on the company intranet and website, inclusion of appropriate ethical clauses in all contracts, etc.). The Personnel Department is assigned the task of promoting the continuous improvement of ethics and initiatives for the dissemination of knowledge and understanding of the Code of Ethics.

5.3. VIOLATION OF THE CODE OF ETHICS

The Personnel Department reports violations of the Code of Ethics that have emerged as a result of stakeholder reports and the relevant proposals for corrective action to the Chairman of the Board of Directors and to the Managing Director of Tecniwell, who assess whether it is appropriate to inform the Board of Directors of the most significant cases. The measures resulting from the establishment of violations are defined by the competent company structures according to the applicable national regulations.

5.4. SIGNALS

Tecniwell has established a specific communication channel for whistleblowing. The whistleblower/reporter shall be afforded the utmost protection, confidentiality and protection from retaliation, unlawful conditioning, inconvenience and discrimination of any kind, for having duly reported a violation in accordance with EU Directive No. 2019/1937 and Italian Legislative Decree No. 24/2023.

Alternatively, all Tecniwell stakeholders may report any violation or suspected violation of the Code of Ethics to the Personnel Department, which will analyse the report, possibly hearing the author and the person responsible for the alleged violation. Tecniwell acts so as to guarantee whistleblowers against any kind of retaliation.