

GENERAL PROVISIONS

- a. The principles and contents of this Code constitute exemplary specifications of the duties of diligence, loyalty, and impartiality that characterize the proper performance of work activities. Employees sign and undertake to comply with them upon hiring and are informed that the applicable collective labor agreement is **METALMECCANICI INDUSTRIA**, including subsequent revisions.
- b. The provisions set forth below shall also apply in all cases where no laws or existing contracts/regulations/procedures are applicable.
- c. The generic term “Company” used in this Code refers to **Termoacqua Tecnologie Srl**.
- d. Where compatible and with due care, the provisions contained in this procedure also apply to all agents, collaborators, or consultants, regardless of the type of contract or assignment, as well as to collaborators of service-supplying companies operating on behalf of the Company.
- e. Therefore, in addition to permanent or fixed-term employees, this Code applies to all individuals who, in any capacity, operate within Company facilities or externally, in the name and on behalf of the Company, including in particular:
 - i. Agents;
 - ii. Consultants and collaborators of any kind;
 - iii. Employees and collaborators of supplier companies directly involved with the Company’s clients;
 - iv. Personnel hired under staff leasing contracts;
 - v. Scholarship holders, interns, trainees, and volunteers.

2. GENERAL PRINCIPLES

- a. In performing their duties, employees ensure compliance with regulations and work procedures, pursuing the Company’s interests and strictly observing the following general principles:
 - i. Loyalty and efficiency;
 - ii. Protection of the Company’s external image toward the market (suppliers/clients/competitors/Public Administration);
 - iii. Responsibility related to assigned duties;
 - iv. Care of Company assets;
 - v. Confidentiality of processed information;
 - vi. Fairness, cooperation, and transparency toward clients and colleagues;
 - vii. Preservation of the trust relationship between employee and Company ownership.
- b. Employees shall align their conduct with principles of fairness, good faith, transparency, equity, and reasonableness, embracing the Company’s Vision and Mission as defined in the relevant ISO instructions.
- c. Employees shall maintain independence to avoid making decisions or carrying out activities related to their duties in situations, even apparent ones, of conflict of interest or image with the Company.
- d. Within working hours, employees devote appropriate time and energy to performing their duties, fulfilling them efficiently in the interest of the Company and its clients, assuming responsibility for assigned tasks and striving for maximum effectiveness.

- e.** Employees use and safeguard Company assets with care and do not use them for personal purposes.
- f.** In relations with clients and suppliers, employees ensure equal treatment under all conditions and refrain from arbitrary actions or discriminatory behavior based on gender, nationality, ethnic origin, genetic characteristics, language, religion or belief, political opinions, minority status, disability, social or health conditions, age, or sexual orientation.
- g.** Employee behavior shall foster trust and cooperation with clients and suppliers, demonstrating maximum availability and facilitating access to information to which they are entitled, within the limits of applicable laws and Company procedures.

3. GIFTS, COMPENSATION, AND OTHER BENEFITS

- a.** In relations with third parties (clients/suppliers/Public Administration), employees must behave in a manner that discourages and prevents practices such as offering gifts or other benefits incompatible with the principles of integrity and legality set out in this Code.
- b.** Permitted items include promotional gadgets distributed generally and indiscriminately, such as diaries, calendars, or similar items.

4. TRANSPARENCY AND NON-COMPETITION

- a.** Employees must inform their direct supervisor in writing of any direct or indirect collaborative relationships with private entities that may compete with the Company.
- b.** In particular, employees—especially those in Commercial and/or Technical roles—shall avoid external engagements that:
 - i. Exceed occasional or sporadic nature;
 - ii. Create potential conflicts of interest with the Company;
 - iii. Are financially predominant compared to Company employment;
 - iv. Involve decision-making or representative roles in entities that are competitors or suppliers to the Company.

5. DUTY OF ABSTENTION

- a.** Employees shall ensure that no relationship conducted on behalf of the Company is influenced by personal considerations. Examples of conflicts of interest include:
 - i. Abuse of authority for personal or third-party interests conflicting with Company interests;
 - ii. Use of confidential information for personal advantage;
 - iii. Direct or indirect involvement of employees or their relatives in activities with third parties that compete with or do business with the Company;
 - iv. Performance of duties in violation of governing rules.

6. SECONDARY ACTIVITIES

a. Employees shall not accept compensation or benefits from third parties for activities related to their job duties, nor solicit additional remunerative assignments beyond their contractual role.

7. IMPARTIALITY

a. Employees ensure equal treatment of clients and suppliers, except where Company interests dictate otherwise.

b. Employees shall reject any illegitimate pressure, even indirect.

8. CONDUCT

a. In dealings with public entities or officials, employees:

- i. Do not exert pressure promising advantages;
- ii. Refrain from spreading harmful or defamatory information;
- iii. Do not disclose confidential details of tenders or selection procedures;
- iv. Do not disclose results before official conclusion without authorization.

9. WHILE ON DUTY

Employees must:

- Respect working hours and assigned responsibilities;
- Use Company vehicles only for authorized purposes;
- Avoid personal use of Company equipment, except in emergencies;
- Ensure efficient and energy-conscious use of resources;
- Properly record attendance;
- Communicate absences promptly;
- Avoid unauthorized social events during work hours;
- Respond to emails within 24 hours, unless urgent;
- Refrain from working under the influence of alcohol or drugs;
- Comply with safety, privacy, administrative, and transparency rules.

10. EXTERNAL RELATIONS

Employees shall:

- Act professionally with clients and suppliers;
- Avoid making unauthorized commitments;
- Use respectful and clear language;
- Respect quality standards;
- Refrain from unauthorized social media disclosures;
- Observe confidentiality and data protection rules.

11. PROVISIONS FOR MANAGERS AND SUPERVISORS

Managers shall:

- Promote Company Vision and Mission;
- Act transparently and impartially;
- Declare conflicts of interest;
- Ensure proper use of resources;
- Promote inclusion, training, and workplace well-being;
- Enforce safety regulations;
- Assign work fairly and evaluate staff impartially;
- Address misconduct promptly.

12. CONTRACTS AND NEGOTIATIONS

Employees involved in contracts shall:

- Avoid unauthorized intermediaries;
- Maintain confidentiality;
- Ensure objective contract execution and documentation;
- Avoid collusive behavior;
- Draft documents supported by verifiable facts.

13. TRAINING ACTIVITIES

- a.** The Company provides professional and ethical training to ensure knowledge of duties under this Code and to enhance specialized skills.
- b.** The Code may be disseminated via email and publication on the Company website.

14. LIABILITY FOR VIOLATIONS

Violations constitute breaches of work duties and may result in civil and disciplinary liability, including dismissal, in accordance with applicable laws and collective agreements.

15. ENTRY INTO FORCE

This Code enters into force upon approval and signature by the legal representative and is published internally and on the Company website.

16. PREVENTION OF HARASSMENT AND VIOLENCE IN THE WORKPLACE

The Company condemns all forms of harassment and violence and commits to appropriate measures, in line with national and European agreements.

17. WHISTLEBLOWING

Although the Company has not yet adopted an Organizational Model under Legislative Decree 231/2001, employees may report unlawful conduct via whistleblowing channels pursuant to Article 54-bis of Legislative Decree 165/2001, including via certified email or to **privacy@termoacqua.com**.