



## **Tekno Alfa s.r.l. – Code of Ethics**

Approved by the Company's Sole Administrator on  
3 January 2020

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Giovanni Borsa

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## INTRODUCTION

Tekno Alfa (hereinafter: the “Company”) is known since over 30 years as a world leading enterprise in the design, construction, assembly and installation of systems, lines, benches and special equipment for assembly, press-fitting, screwing, machining and measurement operations in the industrial automation industry, with “turnkey” solutions specifically developed for the automotive sector.

Tekno Alfa fulfils the most demanding quality standards at the international level, and complies with the most stringent safety regulations of the countries in which it operates. Its business model is inspired by high ethical standards, which are collected in this Code of Ethics (hereinafter: the “Code”) together with their underlying principles. This document spells out the commitments and corporate responsibilities endorsed by the Company towards all its suppliers and stakeholders.

Tekno Alfa adopted this Code of Ethics in support of the norms of conduct dictated by the applicable regulations in order to strengthen practices or codes of conduct that are conducive to ensuring the efficiency and quality of its service portfolio.

Tekno Alfa upholds its adherence to the fundamental regulatory requirements by means of ethical norms that can serve as a standard of reference for its business decisions and for the conduct of its personnel, even when they are not laid down in the applicable laws.

**This document upholds and refers to the principles expressed in the Code of Ethics adopted by *Unione Industriali* of Turin, of which the Company is member.**

This Code is based upon the deontological principles that have always characterised the Company’s business practices, i.e. compliance with legal requirements, ethical conduct, impartiality, truthfulness and completeness of information, which together lay the ethical basis for the Company’s strategy and business goals.

Such principles are formalised and communicated to all Company’s stakeholders by means of this Code, which to this end is also published and duly highlighted on the Company’s website: <http://www.teknoalfa.it/>.

The principles illustrated by the Code define the relation between the Company and its personnel, i.e. between those who provide their services to Tekno Alfa (employees, administrators and other collaborators) and all stakeholders (shareholders, employees, collaborators, external consultants, suppliers, customers and other parties).

The Company promotes these principles so that they can be shared and implemented by all its stakeholders in an effort to ensure a real and proactive cooperation. For this reason, the Company is committed to:

- Sharing the principles of the Code with any partners with whom it has established or is about to formalise a business relation;
- Encouraging such partners to act in compliance with the contents of this Code.

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## The structure of the Code of Ethics and its addressees

This Code is the result of the cooperation and involvement of the Company managers and aims to clarify and formalise norms of conduct actually shared within the Company.

The Code identifies and illustrates the basic elements of corporate ethics by describing:

- The core principles upon which the Company relies, and which, consequently, must also be adhered to by those who work for and/or on behalf of it, as well as by its business partners;
- The norms and standards of conduct that specify in detail the actions and forms of conduct stemming from the core corporate principles that the Company is committed to adopting towards specific categories of partners (stakeholders);
- The relevant implementation modes, which specify how and according to which procedures this Code represents a living document actually implemented within the Company.

This Code applies to all those (specifically human resources) who operate for and/or on behalf of the Company, whether they figure as internal resources (such as managers, supervisors, workers and clerks) or as external ones (external collaborators, agents, consultants and partners).

Complying with the principles and commitments laid out in this Code is part of the responsibilities and tasks assigned to its addressees.

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## Values of reference

The values listed and specified below are part of the value system upon which the Company relies when conducting its business.

### *Responsibility*

“Doing business” necessarily results in an ideal and moral tension that is crucial to mastering the challenges posed by the market and by development needs. Against this background, the responsibility for any decisions, activities and impacts generated represents one of the core elements upon which the promotion of projects and actions geared to sustainable development, innovation and competitiveness must hinge. This principle embraces also the responsibility to fulfil all commitments towards the various stakeholders.

### *Competition, lawfulness and compliance with the applicable rules*

The Company believes in a free and fair competition and strives to achieve results that reward skills, experience and efficiency. Therefore, the Company and its collaborators are committed to fairness when it comes to conducting businesses relevant to the Company’s interests as well as in terms of relations with the Public Administration.

Any attempt to distort fair competition conditions is incompatible with the Company’s policies and forbidden to anybody operating on its behalf.

Furthermore, the Company operates according to the principles of lawfulness and compliance with the applicable rules. Under no circumstances can the pursuit of the Company’s interests justify the violation of the applicable laws, of the norms of the Code of Ethics or of any corporate values on the part of the Company’s managers or collaborators.

Any information about the Company and its activities disclosed to external partners must be true, clear and verifiable.

### *Sustainability, innovation, competitiveness*

If properly integrated, sustainability represents the path towards the achievement of economic, social and environmental goals.

The Company believes that a greater degree of competitiveness can be achieved especially thanks to creativity and innovation, so as to combine economic growth, social cohesion and protection of the natural capital. This approach, which aims to ensure an efficient and effective use of resources, to increase their productivity and to foster a strong market differentiation, allows for value creation processes that can prove sustainable in the long run, to the benefit of society at large.

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### *Compliance with legal requirements*

All addressees are always required to comply with all European, national and regional laws, rules and regulations, as well as with all provisions issued by public authorities, in addition to fulfilling the regulatory requirements of any foreign country in which they should operate for reasons related to the performance of their tasks. The Company does not pursue any goal in violation of the law.

Any violation of legal requirements which may in any way risk involving the Company must be immediately stopped and notified to the Sole Administrator.

### *Impartiality and conflict of interests*

All addressees are required to avoid any situation and/or activity which may result in conflicts of interest or jeopardise their capacity to make impartial decisions. Any conflict of interests must be immediately notified to the supervisors in charge by the addressees, who shall refrain from influencing, whether directly or indirectly, any decision or deliberation concerning the subject matter of the conflict in question.

### *True and complete information*

All actions and relations with any counterparts must be conducted in such a way that all relevant information is provided in a correct, complete, accurate, consistent and timely manner, as required by the applicable standards, within the boundaries of the assets and of the protection of the Company but in such a way as to allow its stakeholders to make autonomous decisions in full awareness of the interests involved, of the available alternatives and of any relevant consequences. Furthermore, the Company is committed to providing on a regular basis information about its activities with the greatest possible degree of clarity, transparency, accuracy and completeness.

All addressees must contribute to providing information in a complete and truthful manner.

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## Standards of conduct towards stakeholders

With all its stakeholders (i.e. people and institutions involved in the Company's activities), the Company establishes and entertains relations based on the principles laid out in this Code of Ethics.

### *Standards of conduct towards human resources*

***In compliance with this Code, the Company ensures that it shall fully implement any legal requirements in order to guarantee fair and safe work conditions, in accordance with the principles of equal opportunities and non-discrimination. At the same time, the Company is committed to promoting the professional development of all human resources.***

These commitments are implemented by means of five core measures:

#### *1. Development of human potential*

The Company is committed to enhancing the skills and abilities of its human resources by offering training sessions, refresher courses and professional development opportunities. With these measures, Tekno Alfa aims to foster the development of all employees and collaborators in order to help them hone their skills, to their own benefit and to the benefit of the Company itself.

#### *2. Sharing corporate goals*

The Company wishes to share its corporate goals with all its personnel as transparently as possible by involving its human resources in the definition of the relevant phases and of the required processes, based on the relevant responsibilities, functions and operating areas.

#### *3. Equal opportunities*

The Company does not tolerate and rejects any form of unlawful employment, exploitation and discrimination, whether upon hiring or at the level of career management or career development. Employees are recruited and selected based on an assessment that determines whether the candidate profile meets the relevant job requirements and the needs of the Company, in accordance with the principles of impartiality and equal opportunities for all those involved. The information required during the selection process and upon hiring is directly related to the checks to be performed in order to verify whether the candidate meets the relevant job requirements, while fully respecting the candidate's privacy and personal opinions.

#### *4. Health and safety in the workplace*

The Company does not tolerate and rejects any form of misuse of authority or any infringement of people's physical and psychological integrity. In fact, Tekno Alfa ensures the availability of work

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environments that meet all applicable requirements concerning health and safety in the workplace. Moreover, the Company monitors and effectively addresses possible risks in order to prevent them.

#### 5. *Privacy protection*

The Company processes all confidential and personal data in compliance with the applicable regulations, thereby ensuring maximum transparency towards the data subjects as well as strict confidentiality towards third parties.

***Similarly, the Company requires all its stakeholders to contribute to creating and protecting a proactive work environment conducive to the professional and personal development of both the employees and the organisation.***

*To this end, the Company asks all addressees to observe the following norms:*

#### 1. *Corporate conduct*

The Company requires its human resources to behave in a respectful manner and to avoid any attitude, use of language or conduct that may strike colleagues or other partners as offensive, provocative or discomforting. Tekno Alfa strictly forbids all its personnel to possess, consume or offer alcohol or drugs in the workplace. It is equally prohibited to work under the influence of such substances.

Smoking is allowed exclusively in the dedicated areas.

#### 2. *Use of the Company's assets*

All Company's assets and resources, whether material or immaterial, must be properly handled by human resources, who must avoid misusing or damaging them, in addition to preventing others from doing so.

The Company forbids human resources to use any Company's assets for purposes other than those related to the performance of work tasks, or in violation of operating procedures, or else in conflict with the Company's interests.

It is necessary to ensure the functionality and proper use of all IT systems as well as to protect the data contained therein, without disclosing any sensitive, confidential or login data.

Furthermore, the Company requires its personnel to use exclusively software authorised by the Company itself, and demands that all PC workstations be password-protected. All personnel are required to keep their access credentials provided by the system administrator strictly confidential.

#### 3. *Gifts and presents*

Supervisors must refrain from asking their team members for personal favours that are not specified in the work contract or are in conflict with the principles of this Code. The Company strictly forbids its personnel to accept from any partner (i.e. supervisors, colleagues, collaborators, suppliers or customers) any gifts or presents of any nature whatsoever that are not part of normal business courtesy, i.e. any gift or present whose value exceeds 100 € (either alone or together with other gifts handed over in the course of the same calendar year by the same person or by one or more non-independent persons). Consequently, such gifts and presents must be refused.

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#### 4. Conflict of interests

All human resources must avoid any situation that may lead, even if only potentially, to a conflict of interests with the Company. Moreover, all human resources are required to notify any such potential situation to the Company.

### *Standards of conduct towards suppliers*

***Suppliers contribute actively and responsibly to the daily business of the Company, which in turn is committed to establishing with such suppliers relations based on cooperation, equality and mutual respect.***

With these suppliers, the Company establishes a transparent exchange of skills and information, thanks to clear communications and instructions and to fair payment policies, in accordance with the relevant agreements and applicable standards.

Orders to suppliers are placed according to well-structured, well-defined and non-discriminatory procedures. In particular, the Company relies exclusively on criteria focusing on the actual competitiveness of services and products and on the conformity to standards concerning the intrinsic quality of products and services, as well as the quality of production processes, which must fulfil the ethical parameters laid out in this Code.

These principles must be observed and promoted by suppliers in the performance of their tasks and in their relations with the relevant stakeholders, as this constitutes an essential requirement in order to establish and maintain a business relation with the Company.

### *Standards of conduct towards customers*

The Company is committed to establishing customer relations based on the principles of impartiality and non-discrimination. The Company is also committed to ensuring contracts and communications that are:

- Clear and straightforward, with the use of a language as close as possible to the one usually adopted by the partner;
- Compliant with the applicable regulations, so as to rule out the possibility of elusive or improper practices;
- Complete, so as to make sure that the customer is provided with all the information needed to make a decision.

### *Standards of conduct towards community and society*

***The Company harmonises its business with the community in which it is fitted and respects the surrounding environment in which it operates.***

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### *Standards of conduct towards Authorities and Public Administration*

*With Public Authorities, the Company has established relations based on the principles of correctness, transparency, cooperation and non-interference. The existing relations always ensure a full, mutual respect.*

The Company carefully avoids any conduct that may be interpreted as collusive or as a violation of such principles, and rejects any form of gift or benefit, whether received or offered, which may jeopardise the independent judgment and conduct of the parties involved, thereby taking its distance from such practices, as these are incompatible with the Company's governing principles.

Commitments with national and local Public Authorities may be entered into exclusively by duly authorised manager. Moreover, the Company strictly forbids all its human resources to offer gifts, presents or other benefits, as well as to solicit or gather confidential information with the aim of exploiting it for their own interest.

Furthermore, the Company forbids its personnel to offer any kind of gifts to any Italian or foreign public officials, including their family members, whether directly or indirectly, as long as such gifts may influence the independence of judgment of such officials or lead them to grant any benefits to the Company, unless the value of such gifts is so limited that it does not jeopardise the integrity or reputation of the parties involved and would not be interpreted by an impartial observer as an attempt to obtain undue advantages.

Any addressee of this Code who should receive from public officials or employees of the Public Administration or other Public Authorities direct or indirect promises of special treatment that fall within the aforementioned category must immediately report this to the Code of Ethics Manager.

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## Implementation of the Code of Ethics

### *Implementation and communication*

This Code, including any future updates, is defined and approved by the Sole Administrator. The Code is published and properly highlighted on the Company' website: [www.teknoalfa.it](http://www.teknoalfa.it)  
The Company is committed to communicating the principles of the Code to any partners with whom it has established or is about to formalise business relations, with particular reference to human resources and suppliers.

### *Monitoring and sanctions in case of violations*

In order to ensure compliance with the norms of this Code, the Company has appointed a specific manager in charge of the Code of Ethics. This function has been entrusted to Mr. **Giovanni Borsa**.  
The Code of Ethics Manager helps all addressees to properly interpret and apply the Code of Ethics, and makes sure that its principles are fully and effectively implemented. More specifically, this manager monitors the way in which the Code is implemented by its addressees. This also involves collecting any relevant feedback or suggestions, which may be communicated verbally or e-mailed to [amministrazione@teknoalfa.it](mailto:amministrazione@teknoalfa.it) by anyone who should notice a case of violation or misconduct (with particular reference to managers and personnel in charge of facilities, offices, departments etc.).  
All reports about possible violations of this Code submitted in good faith are kept strictly confidential. Moreover, the Code of Ethics Manager provides binding recommendations concerning corporate procedures and policies, so as to make sure that these are in line with the principles of this Code, as well as binding recommendations about possible revisions of the Code.  
In case of violations of the Code of Ethics, the Code of Ethics Manager in charge takes specific disciplinary measures, which may even result in the immediate and final dismissal of the employee in question, as long as this is deemed necessary to protect the Company's interests and in compliance with the applicable legal requirements.

### *Validity of the Code*

This Code is valid for 2 years, starting from the date of approval by the Sole Administrator. Upon expiry, the Sole Administrator/Code of Ethics Manager shall thoroughly analyse the Code in order to add any necessary changes or updates.  
If the Code of Ethics Manager should deem it necessary to update this Code before the two-year term of validity has expired, he or she shall immediately notify the Sole Administrator, who shall take the necessary measures within a reasonable timeframe.

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