



## **ETHICAL CODE**

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## **Premise**

This Code of Ethics establishes the principles, rights, duties and responsibilities of **DEKO Srl** towards associates, company representatives, employees, collaborators, customers, suppliers and Public Authorities.

The Code of Ethics (hereinafter the "Code") constitutes the basis of Organisation, Management and Control Model required by Legislative Decree of 8 June 2001 no. 231, whose supervision is entrusted to a specific corporate body, the Supervisory Body, endowed with autonomous powers of taking initiative and control of compliance with the values contained in the company Code of Ethics.

This Code of Ethics has been approved by the Administrative Body.

## **Art. 1**

### **Scope and recipients**

This Code of Ethics establishes the set of principles and rules of conduct which must inspire and to which must abide the corporate bodies and their members, employees, consultants and collaborators in any capacity, customers, suppliers, any other person who may act in the name and on behalf of DEKO srl, as well as all those who, directly or indirectly, permanently or temporarily, establish relationships with the Company.

For these reasons, the recipients of this Code are required to learn its contents and adhere to it.

The Code supersedes over any other provision contained in the internal procedures that may conflict with the provisions prescribed in the Code itself.

## **Art. 2**

### **Compliance with applicable laws and regulations**

The Code of Ethics constitutes an instrument by which the Company, in fulfilling its corporate purpose, undertakes to contribute, in accordance with the Laws and the principles of loyalty, correctness, transparency and responsibility, to the general socio-economic development through the organisation and provision of its services.

Compliance with the laws, regulations in force, the principles and procedures preordained for this purpose, as well as ethically correct conduct, represents a fundamental commitment in the relationship between the Company, the corporate bodies, their members and each employee.

This commitment is extended to consultants, collaborators, suppliers, customers and anyone who has or intends to have relationships with DEKO srl. Business relationships with those who do not share this principle will not be undertaken or will be terminated.

The adoption of all organisational tools aimed at preventing the violation of legal provisions and the principles of transparency, correctness and loyalty by its employees is promoted. Compliance with the rules forming part of this Code of Ethics must be considered an essential part of the contractual obligations of the Company's employees pursuant to and for the purposes of Articles 2104, 2105 and 2106 of the Civil Code. Serious and persistent violation of the rules of this Code damages the relationship of trust established with DEKO srl and may lead to disciplinary action and claims for damages, according to the provisions in art. 7 of Law no. 300/1970 and the current CCNL.

### **Art. 3**

#### **Corporate values and main rules of conduct**

DEKO srl is inspired by the principles of honesty, fairness and transparency in carrying out its corporate mission.

It operates with the following primary objectives:

- satisfy the needs of its customers by offering services adapted to the most advanced standards;
- create value over time for business partners;
- offer quality services, carrying out their actions with professionalism and efficiency;
- offer competence, transparency and understanding of the needs of each client;
- avoid internal situations of conflict of interest between employees and the Company;
- enhance the professional and personal growth of resources;
- respect the rules of the organisation;
- protect the company's reputation and assets;

- develop the value of competition as a drive to the constant improvement of the quality of the products and services offered to customers. The behaviour towards competitors must express fairness , fair competition and transparency, refraining from disparaging or damaging judgments of their reputation and image;
- safeguard the surrounding environment and contribute to the sustainable development of the land.

DEKO srl wants to affirm, even more significantly, the importance of responsible and ethical principles.

In the context of the protocols for implementing the Organization, Management and Control Model referred to in the introduction, this Code constitutes an important and indispensable safeguard with which all company representatives, employees and collaborators must necessarily comply.

#### **Art. 4**

##### **Relationships with partners**

The associates of DEKO srl, together with customers and collaborators, are the most important assets available to the Company: the latter is constantly working both for the maintenance and for the growth of this "wealth".

The behaviour towards the partners must:

- recognize and give them the ability to exercise the right of democratic control, to be heard and to obtain benefits in proportion to the activity carried out;
- show accuracy of information and punctuality, together with direct involvement in the overall choices of the Company, in the forms established by the Articles of Association;
- express the values of correctness, transparency, fairness and honesty, ("favouritism" and "privileges" cannot be granted to any Member, neither for seniority, nor for "social importance" or otherwise).

Partners who have administrative and management responsibilities within the Company must make a particular commitment to creating economic and social value.

## **Art. 5**

### **Administrative, Management and Control Bodies**

Individuals who hold representative, administrative or management functions, as well as supervision and control, are required to conduct themselves with complete honesty, transparency, correctness and independence. The Board of Statutory Auditors and top management are required to carry out their duties by exercising their role with awareness and a sense of responsibility, working in full cooperation and with reciprocal information, in order to promote coordination and the pursuit of corporate purposes and guaranteeing correctness and the authenticity of the documents and information provided in the performance of the related governance functions.

In particular, the Board of Statutory Auditors, the independent auditors and the other persons in charge of controls have free access to the data, documentation and information useful for the performance of their respective activities.

Persons who hold representative, administrative or management functions, as well as supervision and control are obliged to refrain from carrying out any activity that could harm the interests of the Company and from pursuing their own interests or those of third parties, even if only potentially conflicting and / or prejudicial to the same. Upon the occurrence of the aforementioned conditions, the parties involved are required to report them, in accordance with the law and internal provisions.

## **Art. 6**

### **Relationships with employees and collaborators**

DEKO srl recognizes the central role of human resources, which require professionalism, dedication, loyalty, honesty and a spirit of collaboration.

The Company undertakes to create working conditions that are functional to the protection of the mental and physical wellbeing of the workers and to respect their moral personality, avoiding any kind of discrimination, unlawful conditioning or undue hardship.

DEKO srl undertakes to adopt criteria of impartiality, merit, competence and professionalism for any decision relating to employment relationships with its employees and collaborators. Any discriminatory practice in the selection, hiring, training, management, development and remuneration of personnel is prohibited. The

top management bodies work to ensure that all the managers of the individual company functions, employees and collaborators, to the extent of their competence, adopt behaviours that are consistent with the aforementioned principles and functional to their implementation.

The Company is committed to ensuring that each manager behaves fairly towards their collaborators, promoting their professional growth and safeguarding their safety and health in the workplace, in an ambiance backed by the commitment of all and inspired by mutual trust, loyalty, fairness and respect for everyone's dignity.

DEKO srl takes every action aimed at preventing any form of derogation from the principle of equal opportunities and any form of psychological, physical and sexual harassment towards employees and collaborators.

It also protects all employees and collaborators who are involved in:

- promptly reporting any crime, even if only potential, to the bodies in charge;
- facilitating investigations;
- promoting accessibility to data and information.

## **Art. 7**

### **Staff rights**

#### **7.1 Recruitment**

Every single corporate function of DEKO srl that is responsible for the management of resources must take appropriate measures to avoid any form of favouritism, nepotism or patronage in the selection and recruitment of personnel.

The evaluation of the personnel to be hired is carried out on the basis of the correspondence of the profiles requested at that time by the Company and the choices are made on the basis of objective evidence of professional characteristics superior to those of the other candidates. The information requested is linked to the verification of the professional and psycho-aptitude aspects, respecting the personal life and the opinions of the candidate.

The recruitment of personnel takes place on the basis of regular employment contracts, as no form of employment relationship that is not compliant or otherwise elusive of the provisions in force is allowed.

## **7.2 Training and development of Human Resources**

DEKO srl undertakes to take care of the growth of the skills and professionalism of all employees, including non-subordinate ones; specific attention is paid to new hires and employees who are called upon to carry out a new role, as they are faced with a different operational reality and various risk problems.

At the start of the collaboration, the employee (or the collaborator) receives exhaustive information about the tasks to be performed, the function, the regulatory and remuneration elements and the legislation and behaviours to be followed for the correct management of the risks connected to the activity.

## **7.3 Performance and potential evaluation**

The strategic importance of human resources for the achievement of corporate objectives is recognised.

Personnel management is therefore aimed at allowing interested parties to appropriately develop their skills while also offering the widest scope for their professional development, on the basis of objective tools for assessing performance and potential.

In any case, whoever is responsible for the management of resources of any order and level, as well as guaranteeing the correct and orderly performance of the work, must reward professionalism, commitment, fairness and availability, avoiding any form of discrimination or favouritism.

## **7.4 Health and safety**

The creation and management of suitable environments and workplaces from the point of view of the safety and health of employees, in compliance with the relevant national and international directives, represents a factor of particular importance for DEKO srl.

To this end, the Company promotes responsible and safe behaviour and adopts all the safety measures required by the technological evolution, to ensure a safe and healthy working environment, in full compliance with the current legislation on prevention and protection pursuant to Legislative Decree . 81/2008.

The general measures to protect the health and safety of workers in the workplace including temporary and mobile construction sites are:

- the assessment of all risks to health and safety;
- the planning of a prevention system consistent with the technical-production needs of the Company, and with the factors of the environment and work organisation;
- the elimination of risks and, where this is not possible, their reduction to a minimum, in relation to the knowledge acquired on the basis of technological progress;
- compliance with ergonomic principles in the organisation of work, in the design of workplaces and in the choice of equipment in particular in order to reduce the effects on health of monotonous and repetitive work;
- the reduction of risks at source;
- the priority of collective protection measures over individual protection measures;
- health control of workers;
- the removal of the worker from exposure to risk for health reasons inherent to his person and the assignment, where possible, to another job;
- adequate information and training for workers, managers, supervisors, safety workers' representatives;
- adequate instructions to workers;
- participation and consultation of workers and their safety representatives;
- planning the measures deemed appropriate to ensure the improvement of safety levels over time, also through the adoption of good practices;
- the emergency measures to be implemented in the event of first aid, fire fighting, evacuation of workers and serious and immediate danger;
- the use of warning and safety signs;
- the regular maintenance of environments, equipment, systems, with particular regard to safety devices in compliance with the manufacturers' instructions.

## **Art. 8**

### **Staff duties**

Each company representative, employee and / or collaborator must:

- know and observe the content of this Code

- base their conduct on respect, cooperation and mutual collaboration, acting loyally and in good faith, respecting the contractually signed obligations and ensuring the required services.

The company representatives and employees of DEKO srl, regardless of the function exercised and / or their level of responsibility, must know and comply with the company provisions and procedures.

With regards to collaborators, the Company will make this Code available to them, so that they sign a specific declaration of knowledge and undertake not to engage in any behaviour in violation of the principles contained therein.

### **8.1 Reporting**

If a company representative, an employee, a collaborator, a customer or a third party in general becomes aware, for any reason, of the violation of one or more rules of this Code, they must use the following communication channels:

- the hierarchical superior, if the reporting person is an employee;
- the Supervisory Body, in the event that it is not possible (e.g. due to the absence of the hierarchical superior) or appropriate (e.g. due to the involvement of the hierarchical superior) to report to the hierarchical superior or the whistleblower covers a top position.

The managers of the individual company functions must supervise the work of their employees and must inform the Supervisory Body of any possible violation of the rules set out in this Code and in the Organisation Model.

The Company protects those who make reports in good faith from any form of retaliation, discrimination or penalisation, ensuring the utmost confidentiality, without prejudice to legal obligations as enshrined in Law 179/2017 on "*Provisions for the protection of authors of reports of crimes or irregularities of which they have become aware in the context of a public and private employment relationship* (so-called "Whistleblowing").

## **8.2 Conduct**

The personnel, in carrying out their activities, must:

- scrupulously observe the internal regulations in force, ensure compliance with the principles of correctness and transparency and compliance with the laws;
- keep a conduct based on principles of discipline, dignity and morality;
- provide the Company, in carrying out its business, with an active and intense collaboration, according to the directives of the company itself and the rules of the CCNL, as well as observing the obligation of confidentiality.

Each employee is required to fill the role and functions assigned to him/her on the basis of the system of proxies and powers defined and to ensure correct behaviour towards both customers and colleagues and collaborators. Therefore, behaviours that harm or offend the moral dignity and person are prohibited.

## **8.3 Conflict of Interest**

Each company representative, employee and / or collaborator in various capacities has the duty to work in the exclusive interest of DEKO srl, avoiding any situation of conflict that could harm the Company, even if only on a potential or apparent basis or create situations of illicit advantage in one's favour, in favour of family members or cohabitants.

The Company expects employees to avoid even the mere appearance of a conflict of interest.

Any activity that conflicts with the correct fulfilment of one's duties or that could harm the interests and image of the company must be avoided.

Before accepting a remunerated consultancy, management, administration or other assignment in favour of another person, or in the event of a conflict situation referred to above, each employee is required to give written notice to the recipients on the "231" reports.

Before a family member or cohabitant accepts a remunerated consulting, management, administration or other assignment for the Company, or in the event of a conflict situation, each employee is required to give written notice to the recipients on the "231" reports.

## **8.4 Internal control system**

By internal control system we mean the set of rules, procedures and organisational structures that aim to ensure compliance with company strategies and the achievement of the effectiveness and efficiency of company processes, safeguarding the values of the activities and protection from losses, the reliability and integrity of accounting and management information and the compliance of company operations with the law.

The Company promotes the culture of control at all levels as a tool for improving corporate efficiency.

## **8.5 External relationships**

It is forbidden to accept anything of value from customers or counterparties of DEKO srl. The employees cannot request for themselves or for others, gifts or other benefits, nor accept the latter, except for those of modest value or in accordance with normal commercial and courtesy practices, from anyone who has drawn benefit or who may in any case benefit from the business activity.

Furthermore, the employee cannot offer gifts or other benefits to any person from whom he can acquire favourable treatment in the conduct of any activity connected to the Company.

Gifts and benefits offered but not accepted, which exceed the modest value, must be reported to allow for an adequate assessment by one's hierarchical superior, who, according to the established procedures, will inform the Supervisory Body.

Without the prior authorisation of the Administrative Body, with the exclusion of the functions delegated to this, the staff must refrain from issuing statements, interviews or news regarding social affairs to representatives of the press, other media and any third party.

## **8.6 Confidentiality of information and data**

Pursuant to this Code and the European Regulation no. 679/2016 regarding the protection of personal data (GDPR), company representatives, employees and collaborators are required to observe the utmost confidentiality on information, documents, studies, initiatives, projects, contracts, plans, etc., known for services

performed, with particular reference to those that may compromise the image or interests of customers and the Company.

To this end, physical and logical measures are put in place to preserve the integrity of the information managed and prevent it from being accessible to unauthorised personnel.

All information, in particular that learned in the context of the activities carried out for customers, must be considered confidential and cannot be disclosed to third parties, nor used to obtain, directly or indirectly, advantages for oneself, for one's family members or for one's own cohabitants.

The disclosure of confidential information is decided by the top management, as they are responsible for communications and relations with the press.

External communications must follow the principles of truth, correctness, transparency and prudence.

## **8.7 Safeguarding of company assets**

DEKO srl personnel must protect and safeguard the values and assets entrusted to them and contribute to the protection of the company assets, avoiding situations that could negatively affect the integrity and safety of said assets, consisting of a great variety of assets and resources.

Conduct must be responsible and compliant with the established procedures; when it is considered appropriate, its use must be documented.

In particular, employees and collaborators are required to scrupulously adopt all suitable measures and behaviours not to compromise the functionality and protection of the IT systems supplied.

Employees and collaborators are not allowed to make copies of licensed programs for corporate use or for third parties; use the corporate e-mail tools to send e-mail messages, even if necessary to other collaborators or employees, for purposes other than working ones and in any case such as to harm the corporate image or that of third parties; browse illicit websites, with child / pornographic content, or potentially such, or in any case browse websites unrelated to the work activity.

In particular, each employee and collaborator is required:

- to scrupulously adopt any behaviour aimed at not compromising the functionality and level of protection of the company IT systems;
- to refrain from illegally duplicating the programs installed on the company computers;
- to scrupulously adopt the procedures envisaged by the e-mail use policies;
- not to browse websites characterized by indecent, offensive and prohibited content.

The Company expressly prohibits any conduct of alteration of the functioning of computer or telematics systems and / or manipulation of the data contained therein, which is capable of causing unjust damage to others.

Personnel may not use the Company's resources, assets or materials for their own advantage, or in any case for improper purpose of those not instrumental to the exercise of the work activity.

## **Art. 9**

### **Relationship with customers**

The full satisfaction of customer needs is a priority objective of DEKO srl, also in order to create a solid relationship inspired by the general values of fairness, honesty, efficiency and professionalism. The recipients of the Code are required to base their behaviour on criteria of courtesy, transparency, collaboration and to ensure compliance with the confidentiality of the information acquired during the activity, as well as in compliance with current legislation on privacy.

Furthermore, it is considered essential that relations with customers are based on:

- full compliance with laws and Company procedures;
- avoiding having relationships with subjects whose involvement in illegal activities is known or suspected;
- to the exclusion of relationships with those economic activities which, even indirectly, hinder human development and contribute to violating fundamental human rights (for example: exploitation of child labour or use of labour without any protection and guarantee);
- independence from all forms of conditioning, both internal and external.

## **Art. 10**

### **Relationship with suppliers**

The Company undertakes to implement policies for the procurement of goods and services, guaranteeing their finding on the market with the best quality / price ratio, through a continuous search for alternatives on the market which, with the same technical value, offer the best economic opportunities.

The methods for choosing the supplier must comply with current regulations and internal Company procedures.

In this sense DEKO srl:

- endeavours to ensure that anyone in possession of the required requisites has the opportunity to participate in the selection (or tender, if called for) prior to the contract, adopting an objective and documentable criteria in the choice, aimed at guaranteeing sufficient competition;
- provides for the separation of functions between the activity of requesting the supply and signing the contract;
- imposes the preservation and archiving, in the manner established by current legislation and referred to in the internal purchasing procedures, of any information collected and, in particular, of all official documents and contracts stipulated;
- ensures the transparency of the purchasing process in commercial negotiations with suppliers by comparing the negotiation prices with the reference parameters obtained thanks to market analysis.

The choice of the supplier and the purchase of goods and services of any kind must take place in compliance with the principles of competition and equality of the conditions of the bidders and on the basis of objective assessments relating to competitiveness, quality, utility and price of the supply. For the purpose of transparency in the purchasing process, DEKO srl guarantees the traceability of the choices made as well as the preservation of information, documents and contracts.

The Company undertakes to avoid that unlawful advantages are attributed to suppliers and to avoid any preferential treatment to suppliers linked by family ties, cohabitation or friendly relationships with employees.

In no way can employees and collaborators (including their family members or cohabitants) accept commissions, fees or benefits of any kind from suppliers of goods and / or services linked to the Company.

The inclusion of suppliers (outsourcers, consultants, partners, etc.) in the group of recipients of the Organization, Management and Control Model, involves:

- that they must guarantee compliance with the Protocols applicable to them and in particular with the Code of Ethics through suitable instruments of a contractual nature;
- that the Company must implement communication and awareness-raising actions for them on the essential contents of the Model;
- that the Board of Statutory Auditors must check compliance with the Code of Ethics, Procedures and other applicable Protocols, with control actions and, if necessary, with effective sanctions.

DEKO srl, in the choice of suppliers, makes use of a Register whose qualifying criteria do not constitute a barrier to entry.

## **Art. 11**

### **Conferment of professional assignments**

DEKO srl adopts criteria for the conferment of professional assignments inspired by the principles of competence, economy, transparency and fairness.

The Company undertakes to avoid that illegal advantages are attributed to the aforementioned subjects and to avoid any preferential treatment linked to ties of kinship, cohabitation or friendly relationships with employees.

Under no circumstances may employees and collaborators (including their family members or cohabitants) accept commissions, fees or benefits of any kind from professionals or persons in charge of promotion or placement of goods and / or services related to the Company.

The inclusion of professionals in the group of recipients of the Organisation, Management and Control Model involves:

- that they must guarantee compliance with the Protocols applicable to them and in particular with the Code of Ethics through suitable instruments of a contractual nature;
- that the Company must carry out communication and awareness-raising actions to the same regarding the essential contents of the Model;

- that the Company must monitor compliance with the Code of Ethics and the other applicable Protocols with control actions and, if necessary, with effective sanctions. Furthermore, all remuneration and / or sums paid for any reason to the assignees of the aforementioned offices must be adequately documented and, in any case, proportionate to the activity carried out, also in consideration of market conditions.

## **Art. 12**

### **Relationships with Institutions and Public Bodies**

DEKO srl is committed to developing and disseminating corporate culture and values, both inside and outside the company.

The Company pursues these objectives by combining them with its mission and with the need for organizational and management autonomy typical of any economic operator.

#### **12.1 Relationship with the Public Administration**

The Company's relations with the Public Administration, public officials, persons in charge of a public service and the judiciary must be inspired by the most rigorous formal and stringent observance of the provisions of law and applicable regulations, of the principles set out in this Code and of the Protocols included in the Model and cannot in any way compromise the integrity and reputation of DEKO srl.

In particular, the Company undertakes towards representatives, officials or employees of public administrations:

- to prohibit the research and establishment of personal relationships of favour, influence, interference capable of conditioning, directly or indirectly, the outcome of the relationship;
- to prohibit offers of money, goods or other benefits to representatives, officials or employees of public administrations, including through third parties, except in the case of gifts of modest value and provided that they cannot be understood by an impartial observer, as if they were looking for undue favours. In any case, this type of expenditure must be authorised by the persons indicated by the internal regulations (expenditure management regulations) and adequately documented;

- to prohibit the offer or acceptance of any object, service, performance or form of courtesy in order to obtain a more favourable treatment in relation to any relationship with the Public Administration;
- to prohibit the presentation of untruthful declarations to national or EU public bodies in order to obtain public grants, contributions or subsidized loans, or to obtain concessions, authorisations, licenses or other administrative acts or to avoid sanctions or omit sanctionable events;
- to prohibit the alteration of the functioning of an IT or telematics system or manipulate the data contained therein in order to obtain an unfair profit, especially by causing damage or prejudice to the Public Administration;
- to prevent the onset and effects, direct or indirect, of situations of conflict of interest in relation to the Public Administration, of which the subjects acting in the name or on behalf of the entity are the bearers;
- to avoid acts of corruption through illegal payments made directly by top management or its employees, or made through persons acting on their behalf;
- to avoid that, on the occasion of any business negotiation, request or relationship with the Public Administration, the personnel in charge of the Company improperly influences the decisions of the counterpart, including those of the officials who negotiate or make decisions on behalf of the Public Administration;
- to operate, in the event of public tender procedures, in compliance with the law and correct commercial practices, avoiding cartel agreements with other participants, or inducing the Public Administration to unduly operate in favour of the Company.

## **12.2 Relationship with the Environment**

The Company's commitment is to promote, in the appropriate locations, the principles of environmental protection and safeguarding of resources, with a view to reducing the environmental impact of the activities and related risks, and energy efficiency, taking into account the legal requirements and information regarding significant environmental aspects.

All employees are required, as part of their duties, to participate in the process of risk prevention, environmental protection and protection of their own health and safety, that of colleagues and third parties.

### **12.3 Relationship with Political Parties and Trade Union Organisations**

The Company does not contribute in any way to the financing of political parties, movements, committees and political and trade union organizations, their representatives and candidates, except for the cases provided for by specific regulations.

### **Art. 13**

#### **Relationship with the Judicial Authority, the Police and with Authorities with inspection and control powers**

The recipients of this Code must scrupulously observe the current legislation and the provisions issued within the respective areas of activity.

DEKO srl requires full availability and collaboration with the representatives of the Judicial Authority, the Police Forces and the Public Officers which have inspection powers on behalf of any Public Administration.

The recipients of this Code are required to promptly comply with any request from the competent institutions or authorities.

It is strictly forbidden to destroy and / or alter records, minutes, accounting records and any type of document (paper or electronic) or make false statements to the competent Authorities, in anticipation of a judicial proceeding, an investigation or an inspection.

It is not allowed to try to persuade, through the conferral of professional assignments, donations or promises of gifts, money or other advantages (directly or through a third party) whoever carries out checks or inspections or the competent judicial authority.

### **Art. 14**

#### **Accounting records and financial statements**

The accounting is strictly based on the general principles of truth, accuracy, completeness, clarity and transparency of the recorded data.

The management operational facts must be represented in a correct, complete and timely manner in the accounting and company databases.

Each accounting transaction must be traced and adequately documented, in compliance both in form and substance, with the legislation and procedures in force from time to time, in order to allow the identification of the different levels of responsibility and complete finding of facts at any time.

The financial balance sheet, reports and all corporate communications must strictly comply with the general principles of truthful and correct representation of the equity, economic and financial situation in compliance with the general and special legislation in force.

In their conduct, employees and collaborators are required to comply with the principles of separation of accounting and organisational matters, in order to guarantee maximum correctness and transparency in the management of accounting operations.

Any omissions, errors, falsifications of accounting or recorded facts must be promptly reported to the Company's supervisory bodies.

#### **14.1 Prevention of money laundering**

The Company carries out its business in full compliance, both in form and substance, with the current anti-money laundering legislation and the provisions issued by the competent Authorities, by undertaking, to this end, to refuse to carry out suspicious transactions from the point of view of correctness and transparency.

Therefore, it is required:

- to check in advance the information available on commercial counterparties, suppliers, partners and consultants, in order to ascertain their respectability and the legitimacy of their activity before establishing business relationships with these;
- to operate in such a way as to avoid any involvement in operations suited, even potentially, to favour the laundering of money originating from illegal or criminal activities, acting in full compliance with primary and secondary anti-money laundering legislation and internal control procedures.

#### **14.2 Prevention of terrorist crimes, subversion of the democratic order, crimes against the individual**

The Company carries out its business in full compliance with the legislation against terrorist offenses and subversion of the democratic order and against the individual, committing to this end to refuse to carry out transactions which are suspicious from the point of view of correctness and transparency.

It therefore:

- checks in advance the information available on commercial counterparties, suppliers, partners and consultants, in order to ascertain their respectability and the legitimacy of their activity before establishing business relationships with these;
- operates in such a way as to avoid any involvement in operations suited, even potentially, to favour the said crimes.

### **Art. 15 Privacy protection - Principles of implementation**

The Company handles the application and constant updating of specific procedures aimed at protecting information.

In particular, its commitments include:

- ensuring the correct separation of roles and responsibilities within the various figures responsible for the processing of information;
- classifying the information according to the different levels of confidentiality and adopting all the most appropriate measures in relation to each phase of the processing;
- stipulating specific agreements (including confidentiality agreement) with external parties who are involved in the retrieval or processing of information, or who may in any way come into possession of confidential information. Each recipient, with reference to any news learned because of their job function, is obliged to ensure maximum confidentiality, also in order to safeguard the technical, financial, legal, administrative, managerial and commercial know-how of DEKO srl .

In particular, each subject is required to:

- acquire and process only the information and data necessary for the purposes of the function to which they belong and in direct connection with the latter;
- keep data and information in order to prevent them from becoming available to unauthorised parties;
- communicate data and information in accordance with established procedures or with the express authorisation of superiors and, in any case, in the event of doubt or

uncertainty, after having ascertained the disclosure of the data or information in the specific case;

- ensure that there are no absolute or relative restrictions on the disclosure of data and information regarding third parties connected to the Company by relationships of any kind and, if necessary, request their consent.

DEKO srl undertakes to protect, in full compliance with the provisions of the GDPR, the personal data acquired, stored and processed as part of its business.

## **Art. 16**

### **Disclosure of the Code**

The maximum availability of the content of this Code is given to all internal and external subjects who collaborate with the Company, through specific communication and training activities.

Each individual Company function must ensure that all collaborators have a correct understanding of this Code and knowledge of the principles and ethical standards contained therein.

DEKO srl ensures the availability of an adequate program of training and continuous awareness on issues relating to the Code of Ethics. To this end, the Code of Ethics is widely disseminated within the firm, by posting it in a place accessible to all and it is made available to any company interlocutor.

A copy of this Code of Ethics is delivered by the administrative body to each employee or external collaborator at the time of appointment, hiring or starting the employment or collaboration relationship.

The Code of Ethics is transmitted to all interested parties by means of a communication, which will be suitably signed; it as foreseen by art. 7, paragraph 1, Law no. 300/1970, is exhibited "*by posting in a place accessible to all*". It is also available on the Company website.

## **Art. 17**

### **Sanctions**

Anyone who carries out acts or omissions unequivocally aimed at violating the behavioural rules provided for by this Code is sanctioned by the Company through the adoption of disciplinary measures, proportionate to the gravity or recidivism of the fault or the degree of fault.

A violation of the provisions of this Code made by employees constitutes a disciplinary offence and is sanctioned in full compliance with Law 300/70, current legislation, the CCNL, the Company disciplinary code.

The lack of supervision on the part of the managerial staff on the correct application, by the hierarchically subordinate workers, of the rules provided for in this Code, as well as the direct violation of the same, constitutes a disciplinary offence.

With regards to the administrative body that has violated this Code, the Board of Statutory Auditors may take any suitable measure provided for by the law, imposing penalties determined according to the seriousness of the fact and the fault, as well as resulting consequences.

In the event of violation of the provisions set out in this Code by the Company, the applicable regulatory provisions will be applied, provided the conditions exist.

If the violation of the provisions is committed by collaborators, external consultants, or suppliers of goods and services, the sanctions will be established by the competent bodies and in the most serious cases may result in the termination of the contract, in addition to the right of the Company to obtain compensation for damages suffered as a result of the unlawful conduct carried out.

The imposition of sanctions for violations of the Code is the responsibility of the Administrative Body.

## **Art. 18**

### **Monitoring and updating of the Code**

This Code is subject to yearly verification and adjustment to any new legislation or to the evolution of civil sensitivity by the Supervisory Body, in collaboration with the Administrative Body.

## **Art. 19**

### **Closing rules**

The specific provisions of this Code are examples of the most common behaviours and do not limit the scope of application of the general principles expressed.

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