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COMPANY ETHICAL CODE

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1. INTRODUCTION

NTS (below, the Company) shapes the management of its own activities to respect of principles and behavior rules expressed in the present Ethical Code and in the international and national regulations in force in case they are applied.

The organization recognizes the importance of the ethical-social responsibility and the environmental protection in the management of business and the activities of the Company and, to this end, promotes a management of the Company directed to the balance of the legitimate interests of its own stakeholders and the community where it works. For this reason, the Code is based on an ideal of respect of all the interests of the involved parts.

The execution of the performance by the Company's employees and co-workers takes place according to criteria of diligence, competence, professionalism and efficiency, in order to furnish to all the stakeholders a correct Company image and above all high-quality level performance.

Human resources (employees, co-workers), the partners, the managers, the suppliers, the clients, the public administration, the community and, generally talking, all the subjects involved, directly and/or indirectly in the Company's activities are to be considered as relevant parts.

The Leadership plays the role of approving the Ethical Code. The check of the status of adequacy of the Ethical Code as regards the sensitiveness of the Company, its realization and pursuance is within the Leadership itself province with the support of Human Resources and Quality offices.

2. ETHICAL VISION

The organization has set the priority objective of its activity in the achievement of the highest quality and reliability standard for furnished products and services. The achievement of such objective is made possible thanks to the following factors:

- . clear strategic vision
- . safe financial balance
- . long-term experience
- . steady search for innovation
- . vocation at the client service

NTS works for the continuous improvement of the processes, taking inspiration from some basic values:

- . working according to the principles of the maximum satisfaction of the client expectations;



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- . managing the relationship with the client clearly, giving all the necessary technical, financial and commercial information, and guaranteeing a continuous and solicitous service;
- . informing the inner and outer activity about the maximum respect of a human being, in the conviction that ethic in the management of the safety work and the environmental protection is to pursue together with the success of the enterprise;
- . recognizing a strategic role to human resources, maintaining with them relationships focused on mutual respect and refuse of any form of discrimination based on age, sex, sexuality, health conditions, race, nationality, political opinions or religious beliefs;
- . recognizing an inalienable role to training, responsibility and involvement to every level of the whole staff, guaranteeing in the meantime the respect of the physical and moral wellbeing.
- . rationalizing the company management in all its areas;
- . dealing on the market in respect of the basic ethical principles, such as honesty, impartiality and in observance of all the rules and regulations in force (national and community laws, inner regulations or codes, administrative regulations, deontological rules), working hard not to start or pursue no relationship with the person who has no intention to follow this principle.

3. THE STRUCTURE OF THE ETHICAL CODE

This Ethical Code is made up of:

- . general principles, which define the ethical values of reference;
- . behaviors criteria, which specifically furnish guidelines and rules NTS and its Co-workers must follow;
- . realization modalities, which describe the control system aimed at the observance of the Ethical Code and its improvement.

4. THE SCOPE OF THE ETHICAL CODE

The Ethical Code addressees are all the partners, the managers, employees, co-workers of, as well as all the people who, directly or indirectly, permanently or temporarily, establish relationships or relations with the organization itself.

Against it, the Company promotes the largest spread of the Code among all the interested subjects, the correct interpretation of its contents, and furnishes the most suitable means to favour the application of the Code itself.

Furthermore, the organization puts the necessary measures into action in order to carry out check and monitoring activities of the Code itself.



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5. CONTRACTUAL VALUE AND VIOLATION OF THE ETHICAL CODE

The Ethical Code rules represent an essential part of the staff contractual obligations according to the articles 2104, 2105, 2106 of the civil code.

The article 2014 c.c, indexed "Diligence of the worker", states: "The worker must use the diligence requested by the nature of the performance due to them, by the interest of the Company and by the superior one of the national production. Furthermore, it must observe the dispositions for the execution and discipline of work given by the entrepreneur and his co-workers from whom he depends hierarchically".

The article 2105 c.c, indexed "Fidelity Obligation", states: "The worker is not allowed neither to handle a deal on their own or on behalf of a third party, in competition with the entrepreneur or spread news belonging to the organization and production methods of the Company or make use of them, so that they can cause to it some prejudice".

The article 2016, indexed "Disciplinary measures", states: "The inobservance of the dispositions included in the previous two articles gives rise to the application of disciplinary measures and compensation for damage, it being understood, for the employees, the respect of the procedures provided for the article 7 of the law n. 300/1970 (the so-called workers' statute of rights) and for the applicable work collective contracts.

The observance of the Ethical Code rules is considered necessary also in the circle of contractual relationships with subjects outside the Company.

6. MONITORING ON THE APPLICATION OF THE ETHICAL CODE

The company is firmly engaged to enforce the principles shown in the Ethical Code through the institution of a responsible function appointed inside of the company to which vigilance, monitoring and realization functions of the ethical code are assigned.

To this function, among the others, these tasks are assigned:

- . promoting the realization of the Code;
- . promoting communication and specific training programs of the management and employees.
- . examining the reports of the possible violations of the ethical code, promoting the most appropriate verifications.



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6. REFERENCE PRINCIPLES

6.1 Respect of the Law

Compliance with laws, managerial cleverness and honesty, confidence and cooperation with the stakeholders are the ethical principles from which the Company takes inspiration and from which its behavior models come, in order to compete on the market efficiently and loyally, improve the satisfaction of its own clients and develop skills and the professional growth of its own human resources.

To this end, NTS requires from its partners, employees, co-workers, agents, commercial partners, suppliers, contractors and whoever carries out to any qualification agency functions, also actually, the respect of legislation and all the rules in force and the principles and prearranged procedures to this end, as well as good behaviors ethically, so as not to prejudice their moral and professional reliability.

The main rules of reference for the organization are:

. Legislative Decree 81/2008 as amended (Industrial Safety)

. Legislative Decree 152/2006 as amended (TU Environment)

. European Rules n 679/2016

. Legislative Decree 8th June 2001, n° 231- " Administrative Responsibility of the Institutions and following changes and/or integrations

. Administrative rules related to the management of the staff office

. Rules related to general fulfilments in work matters.

. National countable principles

. Principles of good company management

. Fiscal regulations in force

. Inner regulations

6.2 Professional Integrity

Professional Integrity represents the main principle for all nTS activities, its initiatives, its statements, its communications, and it is the essential element of the management and efficacy of its own human resources.

The relationships with the stakeholders are shaped around criteria and behaviors of honesty, partnership, loyalty and mutual respect. For this reason, any form of benefit or gift, received or given, which can be intended as an instrument turned towards the influence on the judgement and behaviour independence of the involved parts is refused.

The addressees of the present Ethical Code:

. must act according to loyalty and good faith in a diligent, efficient and honest way



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. must shape their behaviors around the mutual partnership, in respect of the inner procedures and using the company instruments and time at their disposal.

6.3 Clearness and completeness of the information

The Company recognizes the fundamental value of the correct information to associates, expert authorities and functions, in order to meaningful facts concerning the Company and countable management and in no way justifies the actions of its own co-workers who forbid the control by institutions and in charge organizations.

The Company favours a continuous, punctual and complete flow of information among the social authorities, the different company areas, the Leadership, the various apical figures and, where it is necessary, towards the Public Authorities.

Anyway, the information passed on abroad and inside of the organization itself are respectful of truth, completeness, and accuracy, also in relation to economic, financial and countable data.

6.4 Honesty in the Company management and use of the resources

NTS pursues its own social object in respect of the law and its Statute, assuring the correct operation of the social authorities and the protection of assets and participative rights of its own partners, protecting the integrity of the social capital and assets.

6.5 Relations with the partners

NTS works hard so that, in compliance with the law and Statute, information equality is recognized to all the associates, favoring in this way the diffused and conscious participation of themselves to the decisions within their province.

The Company steers its own activity into satisfaction and protection of its own partners doing its best so that economic performances can protect and increase the enterprise value.

6.6 Privacy of the information

NTS assures privacy of the information in own possession, observance of the regulations in private data management matter and it refrains from researching private data through illegal means.

All information at the Company disposal are treated in respect of reservedness and privacy of the subjects concerned.

Whoever enters into possession of company importance information, or related to any stakeholder, in no case must feel like allowed to spread or use them outside of the operative objects for which they have been allowed by the Company leadership.



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6.7 Protection of the Company's assets

Every addressee is responsible of protection and conservation of the Company's material and immaterial goods hold in custody for the fulfilment of its own tasks, as well as of their suitable way to the Company's objects.

The addressees of the present Code are not allowed to use information for personal objects, goods, equipment they have at their disposal in the execution of the function or the task entrusted to them.

6.8 Value of the Human Resources

The Company recognizes the central position of the "Human Resources" and the importance of establishing and maintaining relations based on loyalty and mutual confidence, exploiting the skills of a subject as well as possible. In these terms, Human Resources are understood as both the employees and co-workers who borrow their work in favour of Societies in contractual forms which are different from the subordinate job one.

All the employees work hard to act loyally in order to respect the obligations undertaken by the labour contract and by how provided for the present Ethical Code, assuring the performance which are requested to them and respecting the undertaken engagements, also through an explicit declaration of full approval of the present document.

Physical and moral integrity of Human Resources, work conditions respectful of the individual dignity and safe and healthy work environments are guaranteed.

For this reason, requests or threats turned to lead people to act against the law and the Ethical Code, or to adopt damaging behaviors of convictions and moral and personal preferences of everybody are not tolerated.

6.9 Impartiality and non-discrimination

In the decisions which have influence on the relations with its stakeholders, NTS avoids every discrimination according to age, sex, sexual inclinations, health conditions, race, nationality, political opinions and religious beliefs of its interlocutors.

The organization always works impartially, avoiding preferential treatments in every context.

In order to guarantee the full realization of this impartiality, no form of gift or homage which can be understood as excess the normal commercial or courtesy practices, or anyway aimed at acquiring preferential treatments in the management of any Company activity is not admitted.



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For a long time, NTS has decided to use, as form of gift or homage, the funding of adoption projects and long-distance younger support, through the brokerage of recognized associations and with the circular of the funded projects to the public and social authorities.

In the management of the hierarchical relationships the organization guarantees that the authority is practiced equally and honestly, escluding every abuse.

6.10 Homages, gifts and other forms of benefits

All the staff belonging to the organization cannot accept gifts or other profits correlated to their activities, unless they have a simple entity (maximum 30 euros approximately).

The addressees absolutely must refrain from non-allowed practices by the law, the uses or the commercial procedures.

The Company allows the grant of only symbolic or reasonable value homages, ascribable to courtesy acts. Then, every form of gift exceeding the normal commercial or courtesy practices, or anyway turned to acquire preferential treatments in the management of any Company activity is harshly forbidden.

6.11 Prevention to corruption and management of conflicts of interest

NTS prevents every form of conflict of interest; it recognizes and respects the rights of its own employees; co-workers; managers, partners to participate to investments, business or other kind of activities outside of the executed in the Company interest ones, unless they are activities allowed by the law and contractual norms and consistent with the obligations undertaken towards the Company.

The conflict between the personal interest and the Company one shows itself whenever a behaviors or a choice done in work circle is able to generate an illegitimate advantage for oneself or one's relatives to the superior Company interest's cost also potentially.

The Conformity Function for the Prevention of Corruption has been attributed to the function, which is responsible of the coordination of the management system (RSI)

It is devoted to its mission of:

- . realizing the necessary checks for the monitoring of the supplies
- . promoting the culture of Risk Based Thinking
- . Improving, as far as it is within its province, the performance of all the management system



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Due diligence

To support and make its own decision-making processes as much as possible efficient, the Company carries out activities of due diligence in relation to all the categories of transactions, projects, activities, business partners and staff members, apart from the risk level which characterizes them.

As an example, among the aids the Company makes use of: published official data, the research in governmental, judicial and international suitable sources of information in the subject;

controls in public lists of exclusions of organizations which have limitations or prohibitions to participate to contracts of public or governmental bodies drawn up by national or local governments or by multilateral institutions, like the World Bank.

6.12 Quality and safety of the products

NTS pursues its own mission through the offering of quality products, in competitive conditions and in respect of all the compulsory rules. It is also shown by the certification of its own quality management system aligned to the rule UNI EN ISO 9001:2015.

The Company's behavior style towards the clients is shaped around availability, respect, and courtesy, in perspective of a collaborative and high professionalism relationship. In communication with the clients, the company assures completeness, honesty and cleverness of all information concerned with features, contents, nature and origin of the products.

The contracts and circulars turned to NTS clients (included advertisements) are and will be clear, truthful, and complete.

The Company guarantees the introduction of products concerned with national and community laws in the subject in the market, putting in action all the necessary controls to the object.

6.13 Responsibility towards communities and environment

NTS works hard to manage its own processes with environmental safety criteria and efficiently through the identification, the management and the control of its own environmental aspects, as well as through the rational use of energy resources and the minimization of the emissions, according to a development model consistent with the territory and environment.



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7. BEHAVIOURS RULES

7.1 Partners

NTS creates the conditions so that the participation of the associates to the decisions within their province is spread and conscious.

The organization strategies towards the associates are mainly directed to:

- . realize the maximum clearness towards the enterprise's stakeholders.
- . answer to the associates' legitimate expectations;
- . avoid the associates' discriminations according to sex, race, language, religion, nationality, political opinions, personal and social conditions;
- . assure to the associates the full participation to the exertion of the social activity and society's government.

In the same way, NTS demands to its own partners the full respect of the rules included in the present Ethical Code.

7.2 Company's background information

NTS assures the keeping of accounting records, the forming and drafting of the balance sheet, the financial statements, the relations, the prospectus, the social communications generally, and all that it is requested for its working, in compliance with the provisions of the law, the principles, the technical rules in force.

Every operation and transaction is correctly recorded, allowed, whose trace is kept also through computerized systems so that it allows the easy accounting record, the identification of the different levels of responsibility and the accurate rebuilding of the operation, also to reduce the probability of interpretation mistakes.

7.3 Management of the financial resources within the Company's activity

The operations and transactions realized by NTS and subject acting in rules and on behalf of itself, are in compliance with the law, the entrepreneurial honesty, clearness principles, verifiability, coherence and congruity and must be correctly allowed, documented and recorded.

The Company constantly monitors the correct use of the financial resources in order to beseech the commission of crimes and manages the financial resources themselves according to clearness and traceability criteria.

The financial outgoing handlings (payments) are executed to the deadlines directly suitable to the expected addressees and not by cash, except particular situations such as to justify a delay or an exception of non- fulfilment according to the article 1460 of the Civil Code.



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7.4 Administrative management and balance

The drafting of the balance sheet and any other type of accounting records must respect the national regulations of primary and secondary rank, the Community regulations and furthermore it is necessary to adopt the accounting principles of reference, guaranteeing a truthful and correct representation of the Company reality and the management facts.

The criteria of truthfulness, accuracy, completeness, and clearness of information acquire a fundamental value for NTS and allow to all the stakeholders to carry out clear evaluations about the economic, patrimonial and financial of the society.

Whoever becomes acquainted with possible omissions, forgeries, irregularities in the keeping of basic accounts and documentation, or of violations of principles established by the Ethical Code is bound to inform the function of prevention to corruption without delay.

The mentioned violations acquire disciplinary importance and are adequately subject to sanctions.

7.5 Human Resources

7.5.1 Selection of the staff

The evaluation and selection of the staff to employ is carried out on the grounds of the correspondence of the candidates' profiles as regards to the awaited ones and the Company's exigencies, in respect of the principles of impartiality and the equal opportunities for all the subjects concerned, avoiding any form of favoritism, patronage system or nepotism. All the decisions made in the circle of the management and development of the human resources are based on considerations of profiles of merit and/or correspondence between awaited profiles and profiles owned by the co-workers. The same occurs for the entrance into roles or different tasks.

7.5.2 Management of the Human Resources

Any form of discrimination towards people is forbidden.

In the management of hierarchical relationships, the authority is executed equally and honestly, avoiding any its abuse.

Requesting, as act due to the hierarchical superior, performance, personal favors and any behavior which depicts a violation of the present Code forms an abuse of the authority position.

The Human Resources are fully appreciated through the activation of the available incentives to favor their development and growth.

For this reason, the expert functions must:



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- . provide for selecting, employing, training, paying and managing the employees or co-workers without any discrimination;
- . create a work environment in which personal features can not give rise to discriminations;
- . adopt criteria of merit, ability and however strictly professional for any decision related to an employee or co-worker;
- . guarantee to all the employees, partners, co-workers a healthy and safe work environment;
- . inform all the employees and co-workers about all the regulation, contractual, regulative dispositions and all the operation and safety procedures.

7.5.3 Health and safety

NTS promotes and spreads the culture of safety, developing the consciousness of the management of the risks, also through specific training, promoting responsible behaviours and protecting, especially with preventive actions, the health and safety of all the employees and co-workers.

All the employees, co-workers, partners are bound to the scrupulous respect of the rules and obligations coming from the regulations of reference on the subject of health and safety, as well as the respect of all the health and safety measures provided by the procedures and inner regulations.

7.5.4 Management of the information and privacy

The privacy of the employees, co-workers, agents, partners, managers and the secrecy of the information is protected in respect of the regulations of reference, also through operative standards which specify the received information and the relative modalities of treatment and conservation, as provided by the programmatic document for safety, to which all the staff is bound to follow scrupulously. Every investigation about ideas, preferences, sexual inclinations, personal tastes, private life and people's health conditions is excluded.

7.6 The Human Resources' duties

7.6.1 Behaviour Obligations

Every employee, manager, partner, agent and co-worker to any NTS qualification also must accept its engagements coming from the present Ethical Code in an explicit form.

In particular, each of them is bound to:



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- . know the dispositions and the rules included inside of it and refrain from behaviors opposite to them;
- . address to its superiors, company representatives in case of explanations on application modalities of themselves.
- . tell promptly the superiors, the company representatives any news of direct revelation or reported by others, as to their possible violations or easy request of violations;
- . collaborate with the facilities appointed to verify the possible violations.
- . inform adequately every third party with which each of them comes into contact in the circle of the work activity about the existence of the Ethical Code and the engagements and obligations imposed by itself to the outer subjects;
- . demand the respect of the obligations which are directly about their activity;
- . adopt the suitable inner initiatives and, if it is within its province, the outer ones in case of a non- fulfilment by the third party of the obligation to comply with the rules of the Ethical Code.

7.6.2 Management of the information

The employees, co-workers, partners, managers are bound to know the content of the programmatic document for safety and realize, how provided by the Company's policy in the subject of the information's safety to guarantee their integrity, secrecy and availability.

Every employee, co-worker, partner, manager is bound to assure the secrecy requested by the circumstances for every news had at the rate of their own work function.

In this regard it is reaffirmed that whoever at any qualification enters into possession of the company information's concern or related to any stakeholder must keep the information secret and in no way they must feel allowed to spread or use it to outside of the work objects for which they have been allowed by the company leaderships.

The obligations of secrecy, according to the Ethical Code, pursue also after the end of the work relationship and/or the contractual relationships, because the spread of secret information can damage the Company's activities, the clients and the Company's partners in any moment.

7.6.3 Conflicts of interest

Every employee, co-worker, manager, partner of NTS is bound to avoid all the situations and activities in which it is possible to show a conflict with the Company's interests or in which it is possible to interfere with its own ability to make, in an impartial way, decisions in the enterprise's best interest and in the full respect of the Ethical Code's rules.



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Every situation which can constitute or determine a conflict of interest must be communicated by every employee, co-worker, manager, partner to their own Company superior or representative promptly.

In particular, all the employees, co-workers, managers, partners of NTS are bound to avoid conflicts of interest among personal and family economic activities and the roles they hold inside of the belonging facility.

As an incomplete example, the following situations determine conflicts of interest:

- . carrying out functions of or having economic or financial interests among supplies, clients, competitors or commercial partners.
- . using one's position in the Company or the information acquired in one's work so that it is possible to create a conflict between one's personal interests and the Company ones.
- . carrying out any type of work activities among clientTS, supplies, competitors.
- . accepting or giving some money, favors or profits by people or corporations being or intent on entering the business relationships

7.6.4 Use and protection of the Company-owned goods

Every employee, co-worker, agent, partner, manager of NTS is bound to work with the due care and diligence to protect the Company-owned goods, through responsible behaviors in line with operating procedures arranged to regulate their use documenting, where it is appropriate, their use.

Every employee, co-worker, agent, partner, manager of NTS is bound to:

- . avoid improper uses which can cause undue costs, damages or reduction of efficiency or anyway in contrast with the Company's interest.
- . in the use of means of communication placed at the Company's disposal (PC, landlines and mobile phones, connection tools to the network and so on), adopt any caution useful to prevent any form of improper use of NTS' s laws and inner regulations; in case of the means' use in the subject outside of the contractually provided purposes it occurs to have a formal authorization of the Company;
- . adopt, how it is provided by policy and inner procedures in order to compromise the functionality, protection and safety of the data processing systems, equipment and installations of the Company;
- . always operate in respect of the safety rules provided by the Law and inner procedures, in order to prevent possible damages to things, people or environment;
- . scrupulously follow the instructions of the company's billboard in terms of access and use of the individual protection tools;



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- . use the Company-owned goods, of any type and value, in respect of the law, the inner rules and principles of the present Ethical Code;
- . use the Company-owned goods exclusively for linked and instrumental objects to the exertion of the work activity; however, it is forbidden, except when it is provided by specific provisions or company agreements, the use or the assignment of property itself by the third party or to third party, also temporarily;
- . operate as far as possible, in order to reduce the risk of thefts, damages or other threats to the assigned or present goods and resources, promptly informing the responsible functions in case of abnormal situations.

7.7 Clients

7.7.1 Behaviour style towards the clients

The Company's behavior style towards the clients is shaped around availability, respect and courtesy, in the perspective of a collaborative and high professionalism relationship.

NTS pursues its own mission through the offer of quality products and services, in competitive conditions and in respect of all the rules put into protection of loyal competition.

It is obligatory for the employees, co-workers, partners, associates and managers of NTS to:

- . furnish, with efficiency, courtesy and promptness, in the limits of the contractual anticipations, high quality products or services, which satisfy the reasonable expectations and necessities of the client.
- . furnish, where it is necessary and in the modalities and forms provided by the company policy, accurate and complete information about products or services of the Society, so that the client can make conscious decisions;
- . satisfy the client's expectations in terms of honesty, clearness and full respect of the law and the contractual agreements;
- . stick to the truth in the advertising communication or of other types.

The relationships with the clients are inspired by principles of honesty, good faith, clearness, professionalism and efficiency. The object of a higher and higher clients' satisfaction depends on:

- . the constant research of a right balance between cheapness and quality of the borrowed service;
- . the staff's training, so that they face to the requests competently and kindly;
- . explicit refuse of any relationship with criminal or Mafia organizations and with subjects who turn to behaviors against the law.



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7.8 Suppliers

7.8.1 Selection of suppliers and contractors

The selection of suppliers and contractors and the determination of buying conditions take place on the basis of objective parameters, such as quality, convenience, price, ability, efficiency, ethical nature, respect of the law.

Then, requirements of reference for NTS are:

- . the interlocutor's professionalism.
- . the availability, opportunely documented, of means, also financial, organized facilities, project abilities and resources, know-how and so on;
- . the keeping of respectful behaviors of the environment and the sustainability policy;
- . the keeping of behaviors' which do not pour into the image and good company title negatively;

In the relationships of contract, supplying and, generally, supply of goods and services:

. adopts; in the selection of the supplier, the criteria of evaluation provided by the existing procedures, in a objective and clear way requesting, before carrying out the selection, the documentation which certifies its professional technical abilities, the performance of the contributing, legal charges and equipment in terms of technical instruments and safety on workplaces;

. it does not preclude to someone being in possession of the requirements requested the possibility of competing with the stipulation of contracts, adopting objective and documentable criteria in the selection of the candidates;

. observes the contractually provided conditions and verifies its full respects with time;

. maintains a frank and open dialogue with the suppliers, in line with the good commercial aptitudes.

. observes and requires the observance of all the obligations imposed by the regulations in force, in the subject of environment, safety, public contracts, contributing and fiscal payments;

. assures the transmission of all the necessary information prone to assure the carrying out of the services in full respect of the legally binding regulations.

To the suppliers it is requested:

- . the respect of the law in general;
- . the respect of the principles of the present Ethical Code and in more general terms of the Management and Organization Model according to the legislative decree 231/2001;



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- . the respect of the regulations in force in the subject of work, with a particular attention to child labour and how it is provided by the regulations in the subject of health and industrial safety and in the environmental matters;
- . not to support in no way neither directly or indirectly Mafia or terrorist associations;
- . the respect of the anticorruption and antitrust principles

7.8.2 Protection of the ethical aspects in the supplies

In the perspective of conforming the supplying activity of goods and services to the ethical-environmental principles of reference, NTS may request, for particular supplies, requirements of social and/or environmental type. To this end, proper clauses may be prearranged in the single contracts.

7.9 Environment and safety

NTS considers the topics linked to the environment and safety of the workers highly relevant.

To this end, in the management of the company activities, the Company takes the energetic efficiency and environmental protection into account, pursuing the improvement of industrial safety and healthy conditions.

In particular, NTS also through the active collaboration of its employees, co-workers, agents, managers, partners, outer services suppliers:

- . promotes and realizes every reasonable initiative aimed to minimizing the risks and removing the causes which can put in danger the safety and health of people, excluding any form of exception or derogation to the inner procedures adopted to this object.
- . continually pays attention and cares to the improvement of its own environmental performance, minimizing the negative impact on the environment and operating a responsible and conscious use of the natural resources; in particular, considerable attention is paid to the waste reduction and to its proper management, to avoid the waste of energy resources and to use renewable energy resources with a view to de-carbonizing its environmental impact.
- . collaborates with its own stakeholders, both inner (ex: employees) and outer (ex: institutions), to optimize the management of the profiles related to the topics about Health, Safety and Environment;
- . keeps elevated standards of safety and protection of the environment in respect of the regulation in force;
- . adopts a policy of use of products consistent with the protection of the Environment and Safety of the workers;
- . transmits and requests to receive all the information, documentations and certifications necessary to assure the total compliance with the legally binding regulation, with particular



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reference to safety and hygiene on workplaces, environmental protection, correct management of work relationships.

The decisions in the subject of health and industrial safety are made by the Company according to some fundamental criteria and principles, made clear in the national and international regulations of reference and in particular in the legislative decree 81/ 2008 and subsequent amendments.

These principles and criteria can be summarized in this way:

- . avoiding the risks;
 - . valuating the risks which can not be avoided;
 - . fight against the risks to the source.
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- . conform the work to the man, for example in the conception of workplaces, in the selection of the equipment and work methods.
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- . take the degree of evaluation's technique into account;
 - . substitute what is dangerous with what that is not dangerous or that is less dangerous;
 - . plan the prevention, aiming at a coherent unit which integrates the technique, the organization of the work, the work conditions, the social relations and the influence of the work environment's factors ;
 - . give priority to the measures of collective protection as regards to measures of individual protection;
 - . give appropriate instructions to the workers;
 - . predispose an accurate information and training system by and toward employees, co-workers, agents, associates, managers, social bodies, partners, contractors, suppliers in general;
 - . guarantee, in any case, the adoption of all the measures which, according to the particularity of the work, the experience and technique, are necessary to protect the physical integrity and the moral personality of the workers.

7.10 Communities

NTS is conscious of the effects of its own activity on the context of reference, on the social and economic development and on the general wellbeing of the community and pays attention, in its own action, to reconcile the interests.

NTS thinks that the dialogue with the stakeholders is of strategic importance for a correct development of its own activity and establishes, where it is possible, a stable channel of



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dialogue with its own stakeholders' representation associations, with the object to cooperate in respect of the mutual interests.

7.11 Relationships with the public institutions

Relationships with the international, national, local and public institutions are exclusively reserved to the functions and responsibilities delegated to it.

NTS works hard to establish, without any type of discrimination, stable channels of communication with all the institutional interlocutors at a both social level and national and community.

These relationships must be oriented to criteria of maximum clearness and honesty, strictness and coherence, avoiding behaviors' of collusive nature.

7.12 Relationships with union and political organizations

NTS furnishes no contribution with parties, movements, committees and union and political organizations, representatives and candidates to them.

7.13 Relationships with the no-profit realities

NTS considers with favor and, if it is appropriate, gives support to cultural and social initiatives oriented to the promotion of the person and the improvement of the quality of life, by approval of the Company's Managers.

7.14 Relationships with the mass-media and spread of the information

The relationships with the press, the means of communication and information and, in more general terms, the outer interlocutors, must be hold only by subjects expressly delegated to it, in compliance with procedures and policy adopted by the Company.

Communications towards the outside follow the guide principles of truthfulness, honesty, clearness, prudence and are turned to favour the knowledge of the Company's policy, programs and projects.

The relationships with the mass media are shaped around the basis of this principle and are exclusively reserved to the Management, which manages them in compliance with the policy adopted by the Company.

The employees, co-workers, managers, partners neither can give information to the outside or work hard to give them, without the Management's authorization.

In no way or form the employees, co-workers, agents, managers, partners can offer payments, gifts or other advantages aimed at influencing the professional activity of the mass media's functions, or which can be reasonably interpreted as that.



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7.15 Relations with the purchasers

NTS, in the context of the relationships with the buyers, guarantees the respect of the principles of uprightness, honesty and clearness in the contractual and commercial negotiations.

The Company constantly works hard to guarantee a higher and higher degree of satisfaction of the purchasers.

7.16 Relations with the competitors

NTS firmly forbids the use of violence or fraudulent means in order to prevent or upset the practice of an industry or a commerce. In the relations with the competitors the Company in fact avoids and condemns any act of disloyal competition and works hard not to implement behaviors suitable to damage other operators conscious of the prejudicial serious effects coming from the violation of the laws for the protection of the competition, among which a long-term reputation damage.

7.17 Public Administration

The relationships related to the Company's activity maintained with official publics or delegates of public service (who operate on behalf of the Public Administration, central and local, or of legislative bodies, community institutions, international public organizations and any foreign country), with the magistracy, vigilance public authorities and other independent authorities, as well as private partners concessionary of a public service, must be undertaken and managed in the absolute and strict respect of the laws and regulations in force, of the principles established in the ethical Code, so that they do not compromise the integrity and reputation of the both parts. To this end, the assumption of engagements with the Public Administrations and Institutions is exclusively reserved to the functions put before and allowed they will carry out them in due respect of the laws and principles of the Ethical Code.

NTS forbids its own employees, co-workers, partners, managers or representatives and, in more general terms, all the people who operate in their own interest, in their own name or on their own, to accept, promise or offer, also indirectly, money, gifts, goods, services, performance or not due favours (also in terms of job opportunities) in relation to relationships maintained with public officers, charged with Public Service or the employees, generally, of the Public Administration or other Public Institutions, or private subjects, to influence their decisions, in view of more favourable treatments or undue performance or for any other purpose.

Any employee, co-worker, agent, partner, manager who receives requests or offers of money or any type of favours directly or indirectly (including for example homages or unreasonable value gifts unduly formulated to those or by those who operate on behalf of NTS in the context of the relationships with public officers, charged with public service or generally employees of Public Administration (Italian or of other foreign countries) or of



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other Public Institutions, or with private subjects (Italian or foreign), must immediately report to the expert inner function for the assumption of the consequent measures.

For this reason, every relationship with international or State institutions is exclusively referable to forms of communication turned to make the activity of, clear, to answer to requests.

7.18 Fundings management

In the request and management of facilitations, contributions and fundings of any nature obtained by the Italian State, by other public body or European Union, requires from its employees, co-workers, managers the respect of the principles of loyalty, clearness and honesty.

To this end, NTS and its employees, co-workers, partners, managers and representatives at any qualification must:


. operate, without any type of discrimination, through channels of communication put before to it with institutional interlocutors at territory, community, international, national level;

. represent the interests and positions of the Company in a coherent, strict and clear way, avoiding aptitudes of collusive nature;

. avoiding the forgeries and/ or changes of the statements or documentary data in order to obtain an undue advantage or any other benefit for the Company and avoiding destinations of public fundings with purposes different from those for which they have been obtained;

. make a scrupulous check of the data included in the declarations turned to the public bodies;

In any case the Company and its employees, co-workers, partners, managers work hard to report any news of behaviours contrary to principles exposed above with which they become acquainted, even if they are hold by possible competitors and/or partners.

revision number	Revision Description	Issued Date	Issued By
0		10/5/2023	Raffaele Ing. RAIA Company President
			Signature
1	Updated cap. 7.9 pag. 18	22/5/2023	Raffaele Ing. RAIA Company President
			 NTS Società Cooperativa Rimigliano (AV) - Via Campo di Fiume 4/bis Zona ASI Arcella P.IVA/CF: 02651090645 - REA: AV-173308