

CODE OF ETHICS 2024



Code of Ethics

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The Code of Ethics is the set of values, principles and commitments that represent our identity and constitutes a guide for Tesi's people and external stakeholders.

Each of us is called to become the protagonist of the organization's culture of values.

We are sure that everyone recognizes themselves in them and we are personally committed to placing them at the center of our individual activities.

The key to our sustainable success is to work every day with commitment and dedication.

1. Purpose

Tesi's Code of Ethics, published for the first time in 2023, was updated in 2024 and aims to be the reference self-regulatory tool for the integration of environmental and social considerations underlying business processes and decisions. It is a document that follows the company's evolution while ensuring transparency and consistency, principles that are the basis of the relationship with stakeholders.

Tesi expresses its commitment to issues related to sustainability with the aim of spreading the principles, values and commitments that underpin the corporate culture.

The Code includes sustainability principles aimed at creating a positive impact on society and the environment.

The following pages set out the principles and guidelines to which Tesi - Ivrea adheres and which inspire our activities by guiding the behaviour of individual employees and our suppliers.

We are a company that has been offering services to customers with passion and dedication for over thirty years, made up of people who believe in the importance of growing together and in the ability to promote values.

The Code makes reliability, transparency, trust and integrity the values for the creation of a reminder for the actions that each person intends to take during the daily work activity.

Tesi is committed to disseminating the Code of Ethics to all collaborators and members so that everyone can align their activities with the principles of the same.

Everyone, as responsible for their own work, is required to know the content of the Code. On the other hand, the responsibility for disseminating the same lies with the company managers.

Tesi carefully monitors compliance with the Code and undertakes to take into consideration any suggestions offered by stakeholders with the aim of modifying or supplementing it.

This document therefore contains the values to which the Company conforms its activities, actions and relationships in order to ensure compliance with the provisions of Decree no. 231 of 8 June 2001.

The contents of the Code are known to all those who have relations with Tesi.

2. Why a Code of Ethics?

Our goal is to create relationships of trust with stakeholders based on solid and sustainable values, those that are recognized as priorities are:

Integrity

Honesty, fairness and transparency are the basis of our actions.

Behaviour in violation of current regulations is not permitted.

Transparency

Transparency is the main feature of our actions and communication, all of which allows us to make conscious and informed choices. We adopt a communication that is immediately comprehensible to the various interlocutors.

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Equity & Inclusion

We are committed to avoiding any kind of discrimination and to respecting differences in gender, age, ethnicity, language and any other type of diversity related to the physical and/or psychological characteristics of the person.

We guarantee respect for equal opportunities and take action to overcome all those factors that may pose a threat to employment inclusion.

Value of the person

We make listening and dialogue the basis for continuous improvement, taking care of people's health and safety.

Environmental protection

We are committed to tackling climate change with a range of actions that help us protect nature and biodiversity and support the transition to a sustainable economy.

Confidentiality

We are committed to ensuring the utmost confidentiality in the management of information and we ensure that confidential information and data are not used for purposes unrelated to work.

The growing interest in the industry in which we operate has prompted us to strengthen our commitment to ethical standards and conduct.

The Code represents the foundation of Tesi's actions and is an integral part of a broader vision of all the commitments and responsibilities that have been adopted to carry out sustainable development.

It is a behavioural reference for the whole Tesi family and it is necessary that it is experienced by everyone, contributing to the strengthening of qualities within our company and the guarantee of high levels of professionalism.

Tesi requires everyone to be aware of the principles contained in the Code and requires managers to be guarantors of an appropriate level of behaviour and human resources to ensure that the provisions of the Code are respected. There will only be room for clear and transparent communications, since "I didn't know" cannot be considered an excuse to justify illegal behavior.

Individual collaborators will be required to:

- Request information for constant updating, discuss and participate in training programs;
- Ask questions if you have any doubts about how to behave;
- Consult the different channels made available to the company for communications on the subject.

Management is responsible for:

- Be a reference on the rules of conduct to be adopted;
- Make sure everyone is aware of the key principles;
- Respond clearly and comprehensively if doubts arise and provide any explanations requested;
- Strengthen the principles adopted and promote new ones.

All actions and behaviours carried out by Tesi people are inspired by correctness, completeness and transparency of information.

2.1 Tesi's commitments and responsibilities

In the face of the increasingly broad responsibility to which companies are called, Tesi wants to respond by committing itself to achieving objectives to promote an economic, social and environmental system that has a positive impact in the creation of shared value for stakeholders.

The contents of the Code of Ethics are aligned with the context in which Tesi operates and take into account the balance between listening to requests and corporate strategies.

The Code becomes, therefore, a tool that is part of a broader vision of responsibilities and commitments that Tesi assumes in support of sustainable development.



3. Scope and dissemination of the Code

Tesi is committed to promoting the dissemination of the Code and all its updates internally and externally.

The Code is published on the company intranet, on the website and is displayed in paper format in our offices.

The values, principles and content of the Code are also shared through training activities consistent with compliance with them and are translated into concrete behaviour during working days.

The recipients of the Code of Ethics are all those who establish relationships with Tesi, i.e. all collaborators, understood as directors, managers, employees and anyone who, regardless of the legal status of the relationship, acts in the name and on behalf of the company. The Code of Ethics will be updated periodically and compliance with it must be considered essential by all levels and an obligation on the part of Tesi's employees. Therefore, training, communication and control tools have been adopted.

The Code of Ethics is the sine qua non for the establishment of collaboration with our company.

Violation of the Code of Ethics entails compensation for damages caused by non-compliance with it and is considered a breach of contractual obligations. Compliance with the Code is in addition to the duties of loyalty, fairness and execution of the employment contract.

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Tesi is obliged to:

- Refrain from conduct contrary to the provisions of the Code of Ethics;
- Directing everyone to respect the Code of Ethics;
- Make sure everyone has read the Code;
- Ask anyone who interfaces with Tesi to read the Code and to comply with its principles;
- Collaborate with anyone responsible for ensuring that the principles of the Code are effectively adopted.

Tesi protects those who report any kind of retaliation and discrimination. Maximum confidentiality is also ensured on the content of reports and identity.

4. Core Values

4.1 People make the difference

The focus on people has always distinguished us. We strongly believe that the creation of an optimal environment in which everyone can find opportunities and freedom of expression is the basis for achieving the challenges that an increasingly complex and demanding market asks to achieve. Our family dimension allows us to ensure fair treatment for all members and to pay attention to every single need or aspiration.

Tesi is committed to creating a safe and healthy work environment and to intervening in the case of conduct that violates these standards, for this reason, in a logic of continuous improvement and promotion of people's well-being, we take into account work, personal and family needs together with work needs through special corporate welfare plans.

All this allows the Tesi family to fully develop their personality without any limitations.

4.2 Diversity and equal opportunities

The goal of Tesi is to provide equal treatment and opportunities to all team members. Our Company does not tolerate any kind of discrimination on the grounds of race, color, sex, sexual orientation, religion, age, disability, marital status and all those protected by law. On the basis of this principle, Tesi guarantees equal treatment to all collaborators in terms of personnel management (hiring, evaluation of the achievement of the required objectives, fair remuneration, benefits, professional growth and dismissals).

We therefore make diversity a competitive advantage, which is why no discrimination of any kind is allowed.

What can we do?

Creating and maintaining a respectful and fair work environment requires:

SPREADING an inclusive culture

BEHAVIORS that do not discriminate against any individual inside or outside Tesi

CONTINUOUS INFORMATION

4.3 Legality

Tesi, in carrying out its activities, requires compliance with all current regulations. Everyone must know and comply with laws, regulations and the content of the Code of Ethics.

What can we do?

Creating and maintaining a respectful and fair work environment requires:

ACT in accordance with all rules

FOLLOW company procedures

VERIFY that all actions comply with the regulation. The principle of Ignorantia legis non excusat applies.

4.4 Fairness and transparency

Fairness and transparency are fundamental in the relationships undertaken by Tesi with other subjects. Everyone, regardless of their role, must abide by the rules of conduct in the interest of the Company. Compliance with the rules, combined with the truthfulness of the information, makes it possible to implement the principle of transparency.

What can we do?

REPRESENT Tesi only if you are authorized

PROVIDE truthful information

4.5 Anti-monopoly measures

Tesi expects the entire team and everyone it deals with to act in a respectful manner. Therefore, no harassment is tolerated either in the workplace or in any other place where employees operate. Harassment is considered any form of language or behavior that causes offense, humiliation or intimidation, to all this is also added jokes or various considerations about gender, skin color, religion, age, etc.

The goal is to create a healthy work environment that is free from abusive or intimidating behavior.

What can we do?

Creating a work environment free from sexual violence requires:

AVOID jokes or comments that may be humiliating

AVOID contact that could result in offensive sexual advances or provocations

INFORM in the event that you suffer from or witness the above-mentioned attitudes.

At Tesi, all workers are guaranteed to carry out their activities in a safe workplace, regardless of the task or role they hold. For this reason, we ask everyone to anonymously report any situation that may constitute a danger to health and safety.

4.6 Working in a safe and healthy work environment

At Tesi it is people who make the difference, everyone makes their own contribution to the creation and maintenance of a respectful work environment aimed at ensuring fairness.

Everyone is responsible for intervening in the event of conduct that violates this standard, all employees are required to comply with the rules in terms of safety since this is a fundamental element within our organization.

Working conditions in a safe and healthy environment are guaranteed for everyone, regardless of their job or role.

The achievement of the objectives must not in any way harm or hinder health and safety. Everyone is expected to know, understand and comply with health and safety laws.

What can we do?

Maintaining a safe and healthy work environment requires:

TAKE appropriate safety precautions

GIVE clear and precise instructions

INFORM those responsible in case of non-compliance with safety procedures

4.7 Human Resource Management in the Selection Process

The Company provides for a selection process based on respect for equal opportunities and human values so that everyone can enjoy fair treatment based on merit and professionalism.

During the selection process, candidates are provided with precise information about opportunities in order to foster personal and professional growth.

At the end of the selection process, Tesi undertakes to the selected candidate by means of a legally valid written contract.

The Company undertakes to ensure:

- Respect for the personality and dignity of each individual already at the stage of the personnel selection process;
- The prevention of discrimination;
- The enhancement of any innovative proposal;
- The definition of roles without neglecting the personal and professional growth of each employee.

4.8 Vocational training and growth

Tesi has always encouraged a collaborative culture with training at the center to allow employees to develop their talent in order to consolidate their skills. Our goal and commitment is to enhance innovative thinking, diversity and individual growth paths.

We are committed to fostering an innovative and dynamic environment to enable people to continue their personal and professional growth combined with a formal initial training process. The aim is to provide suitable training tools to enhance the skills of individuals

In a process of continuous improvement, Tesi has decided to implement a series of periodic meetings during which Team Leaders together with collaborators exchange ideas and define objectives, identifying strengths and weaknesses on which to work by defining a precise growth program.

4.9 Confidential Information and privacy protection

In carrying out its activities, Tesi has to process a large amount of data, documents and information and, in accordance with company policy, they are managed with all the necessary precautions. We prohibit sharing without authorization and use in ways that are not required by applicable privacy and data protection laws.

The processing of personal data is carried out lawfully and fairly.

5. Sustainable development and solidarity

Tesi has always been a promoter of innovative ideas in support of local businesses, aware of the fact that our business success also depends on the reality in which we operate. For this reason, we invest in the territory by taking part in a whole series of initiatives that make the redevelopment process a leading element in terms of innovation and social responsibility.

These's actions are consistent with the focus on sustainable development, they encourage and promote "non-profit" activities that guarantee the commitment made in favor of initiatives for the satisfaction of the needs of the community.


Confident that we can exert a strong influence on the activities and behaviour of customers and suppliers, we are orienting our management to promote an economy that is attentive to the reduction of carbon emissions and the protection of the environment.

We believe that listening and dialogue with the people involved in reducing environmental impacts are essential to ensure responsible management.

Our commitment is based on:

- Promotion of dialogue with all stakeholders
- Active participation in environmental responsibility initiatives
- Raising awareness of the correct practices to be adopted
- Dissemination of environmental values

We believe it is our duty to make everyone responsible for environmental issues, including those concerning climate change.

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Our principles for a correct environmental policy are: the fight against waste, the improvement of energy efficiency, attention to environmental consequences and the protection of nature.

For this reason, we are committed and will continue to strive to:

- Reduce emissions
- Conscious use of resources (we have considerably reduced paper consumption)
- Reduce waste and sort it correctly

6. Rules of conduct

6.1 Confidentiality of company information and prohibition of disclosure

The obligation of confidentiality of information and data is a fundamental principle for each their collaborator.

The knowledge and data processed may not be disclosed externally, in particular it is not permitted:

- To make known to the outside world measures that have not yet been formalized;
- Disclose confidential information;
- Make statements that may put the Company in a bad light.

It is also advisable that all digital documentation is kept securely and that paper documentation is kept in locked archives.

It is forbidden for everyone to leave their PC or any other computer device in their possession unattended.

Tesi's staff is directly responsible for the protection of the company resources entrusted to them, they must be used carefully and responsibly, avoiding loss, theft and damage resulting from negligence.

What can we do?

USE company assets responsibly and according to company policies

FOLLOW the instructions scrupulously

DO NOT BROWSE websites with unseemly content

6.2 Information Management

Each employee is required to comply with the rules of conduct, in fact, the Company is obliged to inform so that everyone is aware of the Code of Conduct and the Disciplinary Code. All documents have been posted on a bulletin board in our offices and published on our intranet. It is up to Tesi to recommend the punctual observance of the rules.

The Code of Ethics establishes rules of conduct that exemplify the obligations of diligence, loyalty and impartiality. For this reason, compliance with it is one of the contractual obligations of each employee, with consequent personal liability in the event of non-compliance.

Tesi asks all employees to behave in a manner inspired by respect, recognition and safeguarding of freedom and equality in full compliance with national and international laws. Everyone is obliged to refrain from any type of inappropriate behavior, always maintaining a polite and respectful attitude.

7. Conclusions

Tesi is committed to ethical and honest conduct.

The Code of Ethics represents the synthesis of the values that underpin our conduct by defining the rights of stakeholders. Compliance with the principles of the same is part of the contractual obligations assumed by individual collaborators.

Tesi asks recipients to know and respect the principles and contents of the Code and to always apply them in the performance of their activities and professional assignments.

Anyone who becomes aware of unethical behavior is required to notify the competent person.

Any reports should be addressed to the mailbox of the Tesi's Company: segnalazioni@tesi-ivrea.com.

Tesi guarantees maximum confidentiality to those who make reports, without prejudice to legal obligations.