

ETHICAL CODE

OPEN LETTER OF FOUNDING MEMBERS

It's with pride that we present the first edition of the TECNOHIT SRL Ethical Code.

The innovative and multiform vision of the product has led the company to a progressive development in the Global market, with the growth of customers and requested services, TECNOHIT SRL has expanded its staff and changed the social form, moving from SNC (cooperative) to SRL (limited).

In view of this targeted growth plan, TECNOHIT SRL does not in any way want to lose sight of those that have been – and continue to be – the guidelines and principles that inspired the founding members: professionalism, efficiency and innovation.

TECNOHIT SRL its constantly forward thinking and its not to keen to use easy slogans and believes in a unique and incontrovertible truth:

The company that doesn't improve, get worse.

For this reason, in January 2018, TECNOHIT SRL decided to adopt its own CODE OF ETHICS, which should not be considered just as a charter of the company's ethical principles but rather a real SUMMA of moral rights and duties that characterize and must connote those who join business vision with daily commitment.

We trust that this Ethical Code can really go beyond the mere formal dictation and taken into effective reference and inspiration for each of our stakeholders, in defining responsibilities and achieving improvement objectives.

At the following link you can download the PDF file of the Tecnohit srl Ethical Code - 01-2018 edition

Costa Volpino (BG), 7th March 2018

The Managers of TECNOHIT SRL

PREMISE AND PURPOSE OF ETHICAL CODE

TECNOHIT SRL, a technical consulting company certified in quality UNI EN ISO 9001:2015 - Certificate number QA/035/16 since 1st June 2016, operates in different and specific market fields – from mechanical design to products industrialization, from analysis of tolerances to numerical simulation – and established from the collaboration of a professional team with consolidated and multi-year experience.

TECNOHIT SRL, strongly believe, that the introduction to ethics is an essential prerequisite for ensuring the reliability of the behaviour of a commercial company projected in the civil and economic context in which it operates.

Aware of the importance of the ethical and moral approach, the directors and founding members of TECNOHIT SRL wanted to provide the customer with an Ethical Code and Conduct that regulates the complex rights, duties and responsibilities that the company itself expressly assumes comparisons with the interlocutors with whom it is daily interacting with. Only through the standardization of the principles of conduct it is possible to enhance and bring out the reference principles of our society, through their constant application.

The adoption of an ethical code, beyond the mere formal data, increases the possibility that a young but ambitious forwardthinking and well established company like TECNOHIT SRL, is able to achieve solid results in the medium-long term objectives, by pursuing:

- maintenance and enhancement of the standards of excellence, professionalism and innovation of the sector in which it operates;

- . progressive development of its activity and increase of visibility and presence on the national and international territory.

The Code of Ethics is the company's fundamental charter, a charter of rights and moral duties that includes the ethical and social responsibility of every members of TCNOHIT SRL company.

For information, communication or signalling inherent to Ethical Code, TECNOHIT SRL has prepared for its employees and collaborators a dedicated email address, to which only the 3 principals have exclusive access: codiceetico@tecnohit.it

The TecnoHit srl Ethical Code - edition 01-2018 it's separated in 4 parts:

- the principles of reference that frame the mission of TECNOHIT SRL and the fundamental values assumed in the pursuit of business objectives (pages 3-4);

- the code of ethics and internal relations of the company: recipients, mandatory limits, rights and duties of the individual figures and company information policy (pages 5-6);

- the company's code of ethics and external relations: relations with customers, marketing, competition, copyright and accounting transparency (pages 7-10);

- the methods of implementation of the code of ethics and the applicable sanctioning principles (pages 11-12);

- the final principles (page 13).

PRINCIPLES OF REFERENCE FOR THE MISSION TECNOHIT SRL

In its path of development and targeted growth, TECNOHIT SRL does not intend to derogate from those that are the cornerstones of its corporate philosophy, reference values, that must always guide the behavior of all the people acting on its behalf, targeting to protect the good name and the company's reputation and the expectations of all the reference interlocutors.

Transparency and correctness

Promote relationships based on the respect of the principles of transparency and correctness, guaranteeing completeness, reliability, uniformity and timeliness of information and avoiding deceptive communications and such behaviors to take undue advantage of other people's positions of weakness or not knowledge.

In addition, ensure maximum loyalty in all relationships, both internal and external. Act with a sense of responsibility and in good faith in any activity or decision.

Effectiveness and efficiency

To constantly improve the effectiveness and efficiency of the service provided, through plans to improve the quality of performance and innovation of technological tools.

Adopt the ideal technical and organizational solutions for the single performance, respecting the quality standards and the right cost of the service.

With a view to efficiency of performance, TECNOHIT SRL uses original, verified and first level multimedia programs, tested for years of use and subject to continuous updates and improvements.

Flexibility

Always placing the specific needs of the customer at the center of each project, adapting the performance to its needs - even ongoing - listening carefully and willingly to any indication and / or request.

Teamwork

The experience gained over the years by the founding members has confirmed that only those who are really capable of opening up, coordinating and relating with others, in the perspective of achieving a common goal, are working at their best.

Today, it is essential to have a collaborative approach in company dynamics.

For these reasons, TECNOHIT SRL constantly fosters and stimulates collaboration, sharing and free exchange of ideas and information among its collaborators and employees.

Confidentiality

Ensure maximum confidentiality on news and information acquired and / or processed during the performance of their duties.

TECNOHIT SRL is autonomously equipped with an internal regulation aimed at eliminating any possible risk of injury to privacy and confidentiality of data and information acquired by customers, with the subscription by each individual employee and collaborator of confidentiality and confidentiality pacts work contract.

The company organizes the information flow in such a way as to observe the specific circuit established for the purpose of preventing crimes pursuant to Legislative Decree no. 231/2001.

Openness and curiosity

Approach the market with an attitude of curiosity.

The heritage of corporate know-how is not immutable and can be enriched not only by the necessary study and innovation, but by the same meeting with different subjects and methodologies.

Fight against all forms of discrimination

Repudiate, in internal and external relations, any discrimination based on political and union opinions, religion, racial or ethnic origins, nationality, age, gender, sexual orientation, state of health, marital status, state of disability, physical appearance, economic condition- social and, in general, any individual characteristic of the human person.

TECNOHIT SRL conforms to the Racial Equality Directive (2000/43 / EC) and the Work (2000/78 / EC) approved by the European Union to protect citizens against all forms of discrimination and subsequent additions.

INTERNAL RELATIONS

Recipients

Recipients of the Ethical Code are all the directors, employees and collaborators of TECNOHIT SRL, without exception and all those who, directly or indirectly, permanently or temporarily, establish relationships or relationships with the company and operate to pursue the objectives, such as contractors, suppliers, service providers.

Each recipient of this Ethical Code is expressly required to know the content and actively contribute to its implementation.

Mandatory

The rules contained in this Ethical Code integrate the behaviour that employees and collaborators are required to observe also in accordance with the rules of ordinary diligence to which the workers are required, governed by the regulations and contracts applicable in the field of employment.

Compliance with the rules contained in the Ethical Code must be considered an essential part of the contractual obligations envisaged for company employees, pursuant to article 2104 of the Civil Code - Diligence of the work provider - as

well as for the company's collaborators and for all those working in the name and on behalf of the same. The obligation to comply with this code is included in the individual contracts.

Duties of employees and collaborators

The employees and collaborators of TECNOHIT SRL must behave in line with the Code of Ethics, report possible violations to directors and, in general, conduct that is inspired by the utmost transparency, correctness and legitimacy, lending its activity with commitment and rigor professional, providing an adequate contribution to the responsibilities assigned and acting in this way as to protect the prestige and good name of the company.

The relationships between employees and collaborators must be based on criteria and behaviors of fairness, collaboration, mutual respect and civil cohabitation. Every employee and collaborator of the company is responsible for acquiring knowledge of the laws and regulations concerning their duties in order to recognize potential risks and to know when to ask for company support. Each employee must base his activity, whatever the level of responsibility connected to the role, to the highest degree of efficiency, following the operational instructions given and must contribute with colleagues and administrators to the pursuit of common objectives.

Suppliers and Third Parts

TECNOHIT SRL requires its suppliers of goods or services to respect the ethical principles contained in this Code, considering this fundamental aspect for the establishment of a correct business relationship.

Supply contracts refer to the obligation to know the contents of the code and to apply the principles consistently.

In choosing its suppliers, the Company operates with the aim of achieving the maximum competitive advantage for the benefit of the Customer and the service provided, always assuming ethically correct behaviors.

Information policy

TECNOHIT SRL undertakes to promote the knowledge of the Ethical Code by its recipients and to carefully monitor its regular compliance, providing for this purpose adequate prevention and control information tools and intervening, if necessary, with corrective actions.

RELATIONSHIPS WITH CUSTOMERS AND DIFFERENT SUBJECTS

In the management and execution of the consulting services requested by the client

TECNOHIT SRL undertakes to ensure that the contracts stipulated with customers and suppliers are carried out according to what is established consciously and freely by the parties.

The customer is the centre of the company's activity and every single consulting service must be made first of all to contribute to the growth of the client.

Each employee and collaborator must always apply the rigorous corporate principles of professionalism, efficiency and innovation in carrying out his work activities.

In the existing relationships, anyone working in the name and on behalf of TECNOHIT SRL should not try to take advantage of contractual gaps or unforeseeable or non-exhaustively regulated events, to renegotiate the contract for the sole purpose of exploiting the position of dependence or weakness in which commercial interlocutor has come to visit. The style of behavior of TECNOHIT SRL towards customers is based on availability, respect and courtesy, with a view to a totally collaborative relationship.

Contracts and communications to customers must be:

- . clear, simple and displayed in the most appropriate form with respect to the type of individual interlocutor;
- . complying with current regulations, without resorting to elusive or otherwise improper practices;
- . complete, so as not to neglect any element relevant to the decision of the customer.

It is the responsibility of TECNOHIT SRL to communicate in a timely manner any information relating to:

- any changes to the contract already foreseen;
- any changes in the economic and technical conditions of service provision or execution of the works.

TECNOHIT SRL undertakes to limit the requirements required of its customers - in compliance with the mandatory requirements of law - to guarantee adequate quality standards of the services / products offered and to periodically monitor the perceived quality and to always give feedback to suggestions and complaints from part of customers using appropriate and timely communication systems.

Marketing and business promotion

In marketing and business promotion campaigns, TECNOHIT SRL expressly undertakes to provide only information corresponding to reality, refraining from any form of misleading or comparative advertising.

The technical skills must be represented truthfully and correctly.

Compliance with the law on free competition

TECNOHIT SRL considers competition as a value and a stimulus to perfecting the service provided and operates in the market in compliance with the principles of loyalty and fairness towards its competitors.

TECNOHIT SRL avoids practices - such as the creation of monopolies or the tacit division of sectors of the market - such as to represent a violation of competition laws.

Within the framework of fair competition, the company does not infringe the intellectual property rights of third parties.

Accounting transparency and document archive

Every operation and accounting transaction with customers and suppliers must be correctly recorded, authorized, verifiable, legitimate, coherent and congruous.

For each operation, adequate supporting documentation of the activity carried out is kept, in order to allow easy accounting registration and accurate reconstruction of the transaction.

Each record must reflect exactly what is shown in the supporting documentation.

All documentation of each individual order must be promptly and systematically archived in such a way that at any time the related accounting and factual framework can be reconstructed; the documents must be stored in electronic media from which they can be quickly traced and viewed using the appropriate software.

No payment will be made to anyone for any reason not pertinent to adequately authorized operations and company contracts. Any negligence, omission or falsification of which the collaborators should be aware, must be promptly referred to the directors.

Anti-money laundering

TECNOHIT SRL expressly undertakes to avoid any kind of implication regarding events related to the laundering of money deriving from illicit or criminal activities.

TECNOHIT SRL expressly undertakes to comply with all national and international rules and regulations regarding recycling.

Before establishing relations or entering into contracts with third parties, the recipients of this Code are required to be sure of the counterpart's reputation, in accordance with the relevant internal provisions.

METHODS OF IMPLEMENTATION, CONTROL AND SANCTIONS APPLICABLE PRINCIPLES

Adoption of Ethic Code

The present Ethical Code (Tecnohit srl Ethical Code - 01-2018 edition) is fully applied to date from its promulgation and making known to the recipients. For this reason, the Ethical Code is made available to all employees and collaborators of the company through hard copy to be requested from the secretariat and is made accessible via internet publication, in a PDF file that can be consulted and downloaded by all interested parties.

For any information or clarification, the employee or collaborator can contact the dedicated email address: codiceetico@tecnohit.it

Update

The Code of Ethics can be modified and integrated, with a joint resolution by the directors and founding members. Any revision and / or substantial variation of the Ethical Code with respect to the previous version must be communicated to all the subjects and interested organisms in the same way as for its first issue.

Sanctioning Principles

The directors, employees and collaborators of TECNOHIT SRL, each within their respective competences and functions, are required to strictly comply with the procedures.

The directors can carry out the checks deemed appropriate to ascertain compliance with the Code of Ethics.

Events and behaviour that can be configured as violations of the Ethical Code must be notified without delay to the directors, with oral communication or address devoted mail codiceetico@tecnohit.it

As soon as the report is received, the administrators must first start, where deemed necessary, targeted internal investigations and proceed with the verification of the case.

The right of the employee or collaborator involved to express their counter-deductions, in compliance with the provisions contained in the art. 7 of the Law n. 300 of 20th May 1970 and in the collective agreement applied to the employment relationship. The preliminary activity is carried out in such a way as to avoid to the reporters any form of retaliation, discrimination or penalization, also ensuring their anonymity and the confidentiality of the facts indicated by the same, without prejudice to legal obligations and the protection of company rights.

Employees and collaborators who misuse the system of reporting violations of the Ethical Code may also be subject to disciplinary measures. It constitutes an improper use to make complaints containing false information and made with a retaliation, vexatious or to damage the image of the presumed author of the reported action.

The violation of the norms of the Ethical Code constitutes breach to the consequential obligations from the relationship of job, with every consequence of law, also in order to the maintenance of the same relationship. The enterprise, in presence of violations of the Ethical Code, it assumes provisions sanctioning according to criteria of coherence, impartiality, uniformity and proportionality, as well as in conformity to the dispositions that control the relationships of job.

The violation of the dispositions of the Ethical Code can determine, according to the single case:

The application of the sanctions and the anticipated disciplinary provisions from the applicable CCNL;

The cessation of the relationship;

The application of penalties;

The reimbursement of the damage.

FINAL PRINCIPLES

The present Ethical Code doesn't want to constitute a condition of employment or a guarantee of employment for the single referring.

The norms and the contained ethical-moral precepts in the present Ethical Code they don't represent in by exhaustive the integral list of the norms and precepts adopted by TECNOHIT SRL neither an exhaustive list of the susceptible behavioral typologies of disciplinary provisions, included the dismissal.

The present Ethical Code. and following modifications and integrations - is now applied to all the employees and collaborators that will come of in then assumed, with specific call in the contract of job. For the employees and collaborators previously assumed to the date of his promulgation, it will be approved from the same through specific acceptance.