




SERVIZI SPECIALI
services, technologies & consulting

ETHICAL CODE

Servizi Speciali Srl


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1. PREMISE

THE VISION OF SERVIZI SPECIALI SRL

Servizi Speciali, founded in 1993, emerged from the convergence of Information Technology and Telecommunications professionals. The company's core mission is to provide comprehensive client satisfaction, addressing specific needs through a full lifecycle of services: analysis, design (civil, military, and industrial), implementation, and after-sales support. The company emphasizes workplace safety and the ecological sustainability of its projects, particularly focusing on energy-saving applications for public administration. Servizi Speciali leverages the extensive technical and cultural expertise of its staff to deliver technologically advanced solutions, operating on both national and international scales. The path of Servizi Speciali to reach the goal set together with the client passes through the possibility of offering the complete solution, within projects that involve the overall creation of a site. To offer maximum customer satisfaction, upon specific request, simulations of the final "environments" are created and previewed, with three-dimensional rendering combined with photo-realistic textures. Servizi Speciali also has a proprietary hardware/software laboratory, capable of offering customized technological solutions for specific needs. Prototypes are designed and created on multilayer electronic boards for industrial production; software applications are developed in diversified environments (such as MS Windows, Unix, Linux, Apple). The technical staff is periodically updated to consolidate their many years of experience and is also trained in technology and workplace safety. In 2021, the Company expanded its corporate purpose to include activities related to the energy sector and more specifically: the construction, both on its own and on behalf of third parties, and the management of plants or parts of plants for the production of electricity from renewable sources, with particular reference to wind power, hydroelectric power, biomass, biogas and photovoltaic, with the application of particular technologies; the offer of integrated services for the implementation and possible subsequent management of energy saving interventions. Also for this purpose the company may: provide all services, energy services, energy efficiency services, integrated energy services both to public and private entities, in the electricity and thermal energy sector relating to the production, transmission, distribution

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and final consumption phases of the same, extendable to other operators active in the performance of all other public utility services (gas, water and so on); perform, manage, carry out and coordinate energy requirement analyses (energy audit) in order to: a) achieve rational and efficient use of energy within production processes (energy saving activities) in order to respect the environmental balance, both internally and externally, of each production activity; b) achieve the optimization of electricity and/or gas supply contracts by also providing measurement services also through "remote reading" methods, even remotely, and energy accounting; the drafting of feasibility studies aimed at verifying the convenience of realizing the self-production of electrical and thermal energy through cogeneration plants and/or plants that use renewable sources; the complete construction, also with the so-called "turnkey" system, of plants, of part of the same and/or of individual components for each type of plant for the production, recovery and cogeneration of energy, with the use of both conventional fuels and renewable sources (biomass, wind energy, water, waste and scraps of all types and solar energy); the complete management, co-management, also on behalf of third parties and in conjunction with third parties, and maintenance, even multi-year, of the aforementioned plants and of the plants collateral and subsidiary to them, and specifically: of plants, systems and equipment for the detection of measurement and control units for the purpose of counting the energy produced, imported, exported, traded in the national system governed by the National Transmission Network Manager (GRTN) and the stock market operator, as well as for systems relating to other utilities (gas, water, etc.); the design, supply, installation and maintenance of systems and programs for connection to electricity, heat or primary source distribution networks, with the obtaining of the relevant connection permits and authorizations; the implementation of development plans, including innovative ones and with the application of new technologies, and optimization for the transmission and exchange of energy as well as for the gas and water cycle; the performance of all activities necessary for obtaining and certifying the right to obtain the so-called "Green Certificates" and "White Certificates" for new production plants and/or for their strengthening, modernization and/or conversion; the production, assembly, mounting, set-up and marketing of: plants for the production of electricity; plants for the transformation of

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high/medium voltage and for the distribution of electricity in alternating and direct current; technological plants; naturalistic engineering works; water and sanitary systems, kitchens, laundries; finishing of general construction works; systems for luminous signage and traffic safety ; non-luminous road signs; road barriers and protections; systems for power plants; structural components in steel and metal; heating and air conditioning systems; special roofing; civil and industrial roofing; tunnel lining structures; noise-reduction systems for mobility infrastructures; the representation and/or resale of all of the above even if produced by other companies both in Italy and abroad; renewables and energy saving.

The Company and aware that the authority of a company recognizes, beyond that from the competence of its collaborators and the high quality of the service provided to customers, also from the attention paid to the needs of the entire community. In this regard, the Company has UNI EN ISO 9001 Certification. This international standard defines the requirements for a quality management system (QMS). This standard helps organizations improve the quality of their products or services, be more efficient and reduce errors.


The principles that from Always inspire the work from the company they come collected formally in an Ethical Code of Conduct in the belief that reliability is built daily not alone guaranteeing there maximum efficiency from the machines in industry but also respecting the rules that govern coexistence in the countries in which we operate and valuing people.

This Code Ethical represents therefore a element distinctive and identifier in the comparisons of the market and of the third parties, there which knowledge and sharing, request to everyone those that who operate in the Company or collaborate with it, constitute the foundation of our activity.

The goal Of SERVIZI SPECIALI SRL is pursue the excellence In the market in which work, through a Development Sustainable, safeguarding the environment and there Safety from the people involved through the consistency of a behavior respectful of ethics Social, getting the satisfaction and ensuring value added for the employee, for the customer and, in general, for the communities to which SERVIZI SPECIALI SRL offers its services.

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The position of SERVIZI SPECIALI SRL on the market as hub of businesses having as object types of sustainable businesses with a positive impact on communities, the environment and natural resources.

UPDATE OF THE CODE

By a decides of the Sole Director, the Code can be modified and integrated, also on the base of the advice and indication coming from Organismo di Vigilanza (if established). In the event of approval of the MOGC ex D. Lgs. 231/01, this Code will become an integral part of the model.

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2. PURPOSE AND RECIPIENTS

The present Ethical Code (followed, The "Code") illustrates the whole of the principles ethical and morals that represent the base of the activity Of SERVIZI SPECIALI SRL (followed, "Company") . The Code illustrates the lines of behavior adopted from the Company is within from the own activity (in the relationships between the staff employee) is on the outside (in the reports with the institutions, the suppliers, the clients, the partners commercial), as well as the organs of information (followed, the "Carriers of Interests").

Respect for these principles is of fundamental importance for SERVIZI SPECIALI SRL to achieve its corporate mission and to guarantee its reputation within the socio-economic context in which it operate.

First of all, it should be noted that SERVIZI SPECIALI SRL firmly believes that every activity must be carried out ethically, recognizing itself in the principle established by art. 41 of the Constitution, in base to the which initiative economic private "Not can to unfold in contrast with the utility social or in way from to bring harm at the safety, at the freedom, at the dignity human."


Everyone the principles here exposed, prior verify of compatibility with their nature and mode of each relationship, will be extended to the relationships between SERVIZI SPECIALI SRL and its contractors, subcontractors, suppliers, consultants, employees, partners and trainees with or without remuneration, pursuant to the regulations and legislation in force. The Code will be widely disseminated within the internal governance structure and widely communicated externally. SERVIZI SPECIALI SRL also undertakes to adopt any further provisions so that they can be promptly disseminated and applied by the principles and the prescriptions of the Code.

RELATIONSHIP WITH THE STAKEHOLDERS

This Code aims to guide the company's conduct towards cooperation and trust with stakeholders. These stakeholders include individuals, groups, and institutions whose contributions are essential to fulfilling the corporate mission, or whose interests are directly or indirectly influenced by the company's activities.

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The company requires its staff to respect the law, act with honesty, demonstrate loyalty to the company, and uphold transparency.

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3. THE VALUE OF THE REPUTATION AND OF THE CREDIBILITY CORPORATE

Reputation and credibility are fundamental intangible resources. Good reputation and corporate credibility foster investments, relationships with local institutions, customer loyalty, human resource development, and supplier integrity and reliability.


In the performance of any corporate activity, unethical behaviors compromise the relationship of trust between the company and its stakeholders. To this end, the conduct and attitudes of anyone, individual or organization, belonging to or in external collaboration with the company, who seeks to obtain an undue advantage or interest for themselves, for SERVIZI SPECIALI SRL. Unethical behaviors are defined as actions that violate laws or conflict with internal regulations and procedures (ISO).

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4. VALUE CONTRACTUAL OF THE CODE

The observance of the rules of the Code must consider oneself part essential from the contractual obligations of company employees pursuant to and for the purposes of Articles 2104, 2105 and 2106 of the Civil Code.

serious and persistent violation from the rules of the present Code lead the relationship of trust established with the company and may lead to disciplinary action and compensation for damages, staying, For the workers employees, The respect from the procedures expected from the art. 7 Legge n. 300/1970 (Statute of the workers) and come on contracts collectives of Work.

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5. PRINCIPLES GENERAL

The conduct of the recipients, at all company levels, is based on the principles of legality, fairness, non-discrimination, confidentiality, diligence, and loyalty.

LEGALITY

SERVIZI SPECIALI SRL works in absolute respect of the law and of the present Code.

All Recipients are fore required to observe all applicable regulations and to keep themselves up to date constantly on the evolutions legislative, also making use of the training opportunities offered by SERVIZI SPECIALI SRL.

The Company considers transparency in its financial statements and accounting records to be an essential principle for conducting its business and protecting its reputation.

CORRECTNESS, LOYALTY AND COLLABORATION

Correctness and moral integrity are a duty unailing for everyone for all recipients.

The recipients of the Code must carry out their own activity in respect of the principles of conduct indicated. The principle of correctness mandates the respect for the rights, privacy, and fair opportunities of all subjects engaged in work and professional activities. The Company therefore undertakes to conduct itself in a fair and impartial manner, applying consistent behavior towards all parties it interacts with, irrespective of the varying forms of relationship and communication necessitated by their nature and institutional role.


recipients are required to refrain from forming any privileged relationships with third parties that arise from external influence intended to gain illicit benefits.

In carrying out their activities, the recipients are required not to accept donations, favors or utility of any type (except objects of modest value) and, in general, to Not accept any compensation in order to improperly grant advantages to third parties.

Conversely, recipients must not make donations of money or goods to third parties, nor offer any illicit benefits or favors of any kind (with the exception of objects of modest value or commercial courtesy gifts authorized by the Company) in connection with activities they carry out for the benefit of SERVIZI SPECIALI SRL.

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The intrinsic conviction of acting in the interests of the Company does not exempt the recipients from the obligation to punctually observe the rules and principles of this Code.

PRINCIPLE FROM FIDELITY'

The Company has cultivated a relationship of mutual trust and fidelity with every recipient working for it. Consequently, adherence to the rules of this Code of Ethics should be viewed by recipients as an integral component of their social obligations.

In particular, concerning the duty of loyalty, there is a prohibition for employees regarding:

- a. Specifically, concerning the duty of loyalty, employees are forbidden from undertaking concurrent employment or consultancy roles with third parties during their contractual engagement if such activities are incompatible with the Company's operations, unless written authorization is obtained from the Company.
- b. Carrying out activities incompatible with one's duties of office or otherwise contrary to the Company's interests.

DIVERSITY AND EQUALITY

SERVIZI SPECIALI SRL promotes gender diversity in key roles and fosters gender equality throughout the company. It actively participates in and supports female entrepreneurship and the presence of women in business by backing and attending dedicated event.


NON DISCRIMINATION

In its dealings with Stakeholders, particularly in personnel selection and management, work organization, supplier choice, selection, and management, and in relations with Public Bodies and Institutions, SERVIZI SPECIALI SRL avoids and condemns any discrimination based on age, sex, race, sexual orientation, health status, political or trade union opinions, religion, culture, or nationality of its interlocutors.

At the same time, SERVIZI SPECIALI SRL actively supports integration, encouraging intercultural dialogue and ensuring the protection of minority rights and vulnerable groups.

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DILIGENCE

The relationship between SERVIZI SPECIALI SRL and its employees is founded on mutual trust. Therefore, employees are expected to operate in a manner that favors the company's interests, in compliance with the values outlined in this Code.

recipients are required to abstain from any activities that could present a conflict of interest with SERVIZI SPECIALI SRL, foregoing the pursuit of personal interests that are inconsistent with the Company's legitimate interest.

In cases where a potential conflict of interest may arise, recipients are required to promptly contact their hierarchical superior. This allows the Company to evaluate and, if appropriate, authorize the activity potentially in conflict.


In the event of violation, the Company will adopt all appropriate measures to put an end to the conflict of interest, reserving the right to act for its own protection.

LOYALTY

SERVIZI SPECIALI SRL and its recipients commit to achieving fair competition, in compliance with national and EU regulations. This commitment stems from the understanding that healthy competition serves as a positive incentive for innovation and development processes, while also protecting the interests of consumers and the community.

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6. REPORTS WITH THE EMPLOYEES AND WITH THE COLLABORATORS

VALORIZATION FROM THE RESOURCES HUMAN

Human resources represent a fundamental factor for the development of the Company . Therefore, SERVIZI SPECIALI SRL protects and promotes professional growth with the aim of increasing the wealth of skills possessed by its employee.

SELECTION OF THE STAFF

The evaluation and selection of personnel are carried out according to correctness and transparency, respecting the even opportunity to the end of to conjugate the needs of SERVIZI SPECIALI SRL , with the professional profiles, ambitions and expectations of the candidates. SERVIZI SPECIALI SRL commits to adopting all necessary measures to prevent any form of favoritism in the personnel selection process. This is achieved by using objective and meritocratic criteria, respecting the dignity of candidates, and acting in the best interest of the Company's performance.


Newly hired staff receive clear and accurate information about their roles, responsibilities, rights, and duties, partly through the implementation of this Code.

MANAGEMENT OF THE STAFF

SERVIZI SPECIALI SRL protection and enhances the own resources human, committing himself to maintain constant the conditions necessary for the professional growth, knowledge and skills of each person, carrying out the appropriate training for professional updating and any initiative time to pursue such scope. For every employee, an adequate training plan is established at the beginning of each year. Additionally, a "Career Deal" is set up, which defines measurable commitment and result objectives for each individual. Upon achieving these objectives, both a salary bonus and career/role advancement are provided. SERVIZI SPECIALI SRL promotes the participation of the workers at the life of the company, providing participatory tools capable of gathering workers' opinions and suggestions, ensuring their broadest participation. This principle is realized in periodic meetings that take place approximately every last Friday of the month, in which workers share the activity turns

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during the month, the opportunity commercial generates and the results achieved. The opportunity is exploited also to carry out training, both professional and safety related.

Without prejudice to maximum availability and flexibility from and towards employees, no worker can be forced to perform tasks, services, or favors not stipulated by their employment contract or role within the company.

The Company is firmly committed to combating incidents of mobbing, stalking, psychological violence and any discriminatory or damaging behavior to the dignity of the person inside and outside the company premises.

Relationships between employees must be conducted with loyalty, fairness and mutual respect, in compliance with the values of civil coexistence and the freedom of individuals.

VALUE FROM THE PERSON

The company advocates a use from the resources human that respects and enhances the individual characteristics, protects diversity and is based mainly on the use of dialogue and listening, with a view to promoting development and professional growth.

All recipients of this Code, in pursuing corporate objectives, must comply with the dignity of individuals and their right to privacy. Harassment and insults of any nature are not tolerated. They must also maintain a climate of mutual respect within the company company.

IMPARTIALITY AND PRINCIPLES OF NO DISCRIMINATION


In its dealings with all stakeholders, both internal and external, the Company commits to avoiding any discrimination based on:

- age, sex, orientation sexual, state of health, disability, tongue, ethnicity and nationality;
- beliefs personal, political, philosophical or religious;
- possible adhesion or less to an association union; possible withdraw from the

same.

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ENVIRONMENT FROM WORK

SERVIZI SPECIALI SRL is committed to offering its staff a healthy and safe working environment.

Workplace safety is ensured both by rigorously implementing current legal provisions and by actively promoting a culture of safety through specific training programs. The training of staff represents a central element of the management system adopted.

SERVIZI SPECIALI SRL protects the health of its workers, also guaranteeing compliance with hygiene and health prevention standards.

HEALTH AND SAFETY


The Company is committed to scrupulously respecting the regulations regarding health and safety, as well as applying them within the workplace.

To preserve the health, safety, and physical integrity of the recipients, the Company undertakes to consolidate and disseminate a culture of safety. This involves developing a greater awareness of risks and promoting responsible behavior.

The Company ensures maximum cooperation from its collaborators and employees towards the Head of the Prevention and Protection Service and anyone wishing to inspect and control the premises and related work systems.

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7. MANAGEMENT OF THE COMPANY OBSERVANCE OF THE PROCEDURE INTERNAL

SERVIZI SPECIALI SRL believes that efficient management and a culture of control are essential elements for achieving objectives.

Recipients are required to strictly comply with the company's internal procedures and instructions. In particular, this refers to the "Internal Regulations regarding Working Hours" and the "Regulations regarding Travel Expenses."

Recipients must act in accordance with their respective authorization profiles and retain all suitable documentation to maintain a record of actions undertaken on behalf of the company.

MANAGEMENT ACCOUNTANT

In managing financial accounts, recipients must adhere to the principles of truthfulness, accuracy, and transparency. This ensures the reputation of SERVIZI SPECIALI SRL is protected both internally and externally.

Adhering to these principles also allows the company to plan its operational strategies based on its genuine economic and financial situation.

Therefore, all entries reported in accounting must be supported by complete, clear, and valid documentation, preventing any form of omission, falsification, or irregularity.

For asset or economic elements based on valuations and estimates, their registration must be guided by criteria of reasonableness and prudence


PROTECTION OF THE HERITAGE

Recipients must exercise their functions by rationalizing and containing the use of company resources.

Recipients are required to correctly apply safety provisions to protect hardware devices from unauthorized access. Such access could seriously harm the rights concerning the personal data protection of SERVIZI SPECIALI SRL's staff and customers.

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PROTECTION OF THE NAME AND ABOUT THE LOGO

Recipients of this Ethical Code must not commit actions capable of endangering or compromising the Company's values, image, or good name.

All recipients are also required to avoid any use of the Company's name and logo in ways that are not compliant with corporate objectives or that may otherwise damage the Company's prestige and good name.

COMMUNICATION

SERVIZI SPECIALI SRL provides Stakeholders with appropriate communication tools, enabling them to interact with the company to submit requests, seek clarifications, or make complaints.

SERVIZI SPECIALI SRL promotes effective corporate communication that connects the company with civil company. This allows us to understand the community's requests, needs, and requirements, while also disseminating our values and mission.

The information disseminated to Stakeholders is complete and accurate, enabling recipients to make well-informed decisions.

SERVIZI SPECIALI SRL's advertising and promotional activities uphold ethical values, protect minors, and reject vulgar or offensive messages.


CONFIDENTIALITY FROM THE INFORMATION

There Company, conforming to the prescriptions in matter Of protection of the data personal provided for by Regulament European 2016/679 ("Gdpr"), from the D. Lgs. 06/30/2003 n. 196 ("Code Privacy") as amended and integrated by D. Lgs. 101/2018, and subsequent amendments and additions, guarantees that the processing of personal data and confidential information, collected and preserved from the Company, and direct exclusively to carry out the purpose pertaining to the exercise of their business.

The recipients of this Code undertake to act in accordance with the Company's Data Security Policy, to protect the confidentiality of personal data collected and processed, and not to use confidential information learned by virtue of their activity working, for purposes

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strangers to the exercise of such activity, and Anyway to always act In the respect of the obligations of confidentiality hired from SERVIZI SPECIALI SRL in towards all Stakeholders. In particular, the recipients are required to maintain maximum confidentiality on documents capable of revealing know-how, transport information, commercial information and corporate transactions.

ENVIRONMENT AND SUSTAINABLE DEVELOPMENT


The company commits to act in the respect from the regulations in force in matter of environmental protection. The Company is attentive to environmental issues, therefore:

- a. apply the best technologies available, minimizing he impacts environmental caused, directly or indirectly, from the activity of the own plants productive;
- b. develops the own activity, optimizing the use of the resources natural;
- c. preserve the environment surrounding, adopting eco-efficient technologies.

The Company requires that the recipients of this Code, involved in operational processes that may have environmental repercussions, carry out their work conscientiously and in compliance with current regulations.

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8. REPORTS CON THE OUTSIDE

REPORTS WITH AUTHORITY AND PUBLIC ADMINISTRATION

Relations with the Authorities and with the Public Administration must be based on the utmost clarity, transparency and collaboration, with the full respect from the law and second the highest moral and professional standards.

The Recipients, save express authorization, not they can relate in name and for count of SERVIZI SPECIALI SRL with the Authorities and with the Public Administration.

In relations with Public Officials, Public Service Officers, and the Public Administration in general, the Authorized Recipients shall adhere to the highest levels of correctness and integrity, abstaining from any form of pressure, explicit or veiled, aimed at obtaining any undue advantage for themselves or for others.

In this regard, the Authorized Recipients will be required to strictly observe the provisions of this Code, as well as, more generally, the provisions of the directives issued by the management of SERVIZI SPECIALI SRL.

The Company has also adopted specific ethical and behavioral rules regarding anti-corruption. This framework allows for qualifying as illegal any activities undertaken by employees, consultants, and collaborators (in various capacities) that are carried out to benefit or on behalf of the company and enable it to obtain an undue interest or advantage. SERVIZI SPECIALI SRL does not permit any form of corruption and undertakes to comply with the anti-corruption laws in force.

REPORTS WITH ORGANIZATIONS POLICIES AND TRADE UNION


SERVIZI SPECIALI SRL does not favors or discriminate against any organization politics or union.

The Company refrains from providing any undue contributions, in any form, to political parties, unions, or other social organizations, except for specific exceptions and always within the limits permitted by current regulations.

The Recipients kept to refrain from any pressure direct, indirect or boasted about towards political figures or trade union representatives.

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RELATIONSHIP WITH CLIENTS AND SUPPLIERS

Recipients interact with third parties courteously, competently, and professionally. They believe that their conduct is crucial for protecting the company's image and reputation, and consequently, for achieving corporate objectives.

In particular, the Recipients they must refrain from any form of behavior unfair or deceptive that may induce the customers or the suppliers to rely on facts or unfounded circumstances. Recipients are required to consistently strive to offer timely and high-quality services to customers, seeking to limit any form of poor service or delay to maximizing customer satisfaction.

The relations with the suppliers are imprinted to loyalty, correctness and transparency.

The selection of the suppliers it happens exclusively holding present the criteria of competitiveness, quality, cost-effectiveness and price, as well as the ability to provide and guarantee services of an adequate level. The choice of suppliers on a merely subjective and personal basis or, in any case, by virtue of interests conflicting with those of the company is precluded.

Recipients must implement all possible checks to ensure that suppliers and customers also comply with the fundamental ethical principles outlined in this Code.


TRANSPARENCY, EQUALITY, LOYALTY, DILIGENCE IN THE PERFORMANCE OF THE CONTRACTS AND FREE COMPETITION

The reports with the suppliers are imprinted to the principles of transparency, equality, loyalty and free competition. Therefore, the employees, in the exercise from the activity times to entertain the reports of supply, must:

- a. to respect the regulations in force and the conditions contractual expected;
- b. comply with the Company's internal procedures relating to the management of relationships with suppliers;
- c. ensure the satisfaction from the needs of quality, safety and times of delivery of goods/services, collaborating with the supplier;
- d. have some correspondence with suppliers transparent And complete;

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- e. Not go up any form of conditioning from part of the suppliers, during the assumption of decisions or the execution of acts pertinent to one's own work activity.

The company and the supplier must operate to build a collaborative and mutually trusting relationship. The Company commits to correctly and promptly informing suppliers about the characteristics of the business, payment terms, and schedules. This is done in compliance with current regulations and the counterpart's expectations, taking into account the circumstances, negotiations, and the content of the stipulated contract.

The supplier's fulfillment of contractual obligations must adhere to the principles of equity, fairness, diligence, and good faith, and must also comply with current legislation.

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9. SYSTEM FROM CHECK INTERNAL

Compliance with the provisions of this Code is entrusted to the prudent, reasonable and careful supervision of each of the Recipients, within the scope of their respective roles and functions within the company.

All recipients are invited to report to their superiors any facts and circumstances potentially in conflict with the principles and provisions of this Code.

The management of SERVIZI SPECIALI SRL and the relevant governing bodies will take all necessary measures to end violations. They are authorized to resort to any disciplinary action, in accordance with the law and the rights of workers, including trade union rights.

LINES GUIDE OF THE SYSTEM PENALTY

The internal control system is designed to adopt tools and methodologies aimed at counteracting potential corporate risks. This ensures compliance not only with laws, but also with internal provisions and procedures accessible on the company's internal website. Violation of the principles established in the Code and in the procedures indicated in the internal controls compromises the relationship between the company and the own administrators, employees, consultants, collaborators to varied title, customers, suppliers, business partners and financial.

Such violations will be immediately pursue from SERVIZI SPECIALI SRL in incisive and timely manner , through the adoption of adequate and proportionate disciplinary measures.

The effects of violations of this Code of Ethics and internal protocols must be taken into consideration by all individuals who, in any capacity, have a relationship with SERVIZI SPECIALI SRL.


Depending on the severity of the conduct undertaken by the individual involved in any illicit activity outlined in this Code, SERVIZI SPECIALI SRL will promptly take appropriate measures. This will occur independently of any potential criminal prosecution by judicial authorities.

Stopped How much above exposed, the behaviors in violation of the Code Ethical constitute:

- Serious breach by employees with sanctions applied depending on the severity, expected from the CCNL applied ("Trade And Services") Of category (reprimand verbal,

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reprimand written from part of the company and/or of the Consultant of the Work, fine not superior three hours of remuneration, suspension from the work and from the remuneration until to a maximum of Three days working, dismissal for right cause or justified reason); Should criminal charges be brought, or a measure restricting personal freedom be executed against an employee, the company may opt to suspend the employee from service and remuneration before adopting any definitive disciplinary measure. This suspension will last for the duration corresponding to the outcome of the criminal proceedings or until the restrictive measure concludes;

- right cause for revoke of the mandate to the administrators;
- cause of resolution immediate of the relationship, in the cases more serious, For the external collaborators and employees;
- cause of resolution immediate of the relationship, in the cases more serious, for the suppliers, contractors and subcontractors.

The identification and application of sanctions must account for the general principles of proportionality and suitability with respect to the violation in question.

In all the aforementioned hypotheses, SERVIZI SPECIALI SRL also reserves the right to take all actions it deems appropriate to seek compensation for damages suffered as a consequence of behavior in violation of the Code of Ethics.

WHISTLEBLOWING


Due to the introduction of the discipline of the so-called whistleblowing in the context of D. Lgs. 231/2001, the Company was forced to integrate Model 231 with a reporting management system that allows for the protection of the whistleblower's identity and the related right to confidentiality.

There Company therefore:

- keeps more strict confidentiality on the reports receipts;
- guarantees the confidentiality of identity of Who transmits to the Organism information useful for identifying behaviors that differ from those provided for by the Model, the procedures established for its implementation and the procedures

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established by the control system internal, facts save The obligations Of law And there protection of the rights from the Company or of persons accused wrongly and/or in bad faith;

- protection the reporting from any act of retaliation or discriminatory for reasons connected to the report;
- applies appropriate sanctions against those who violate the whistleblower protection measures and/or those who send unfounded reports.

INSTITUTIONS OF THE ORGANISMO FROM SURVEILLANCE

SERVIZI SPECIALI SRL will provide the constitution to the own inside the Organism Of Vigilance, having the task of supervising the implementation and compliance with this Code of Ethics and the Organization, Management and Control Models, of which to the D. Lgs. 231/2001, which will be implemented coherently with the Code itself.

The Organism of Vigilance is an organ gifted of independence, of full autonomy of action and control, whose activity is characterized by professionalism and impartiality, to which is attributed such load through specific act deliberative of the Sole Director.

The members of the Supervisory Body serve for the term established in the Sole Director's Act of Appointment, and they may be revoked by the Sole Director only for just cause.

KNOWLEDGE AND OBSERVANCE OF THE CODE ETHICAL

The Company oversees the dissemination of this Code to external collaborators and consultants. The latter, in turn, are obliged to observe its provisions regarding their areas of competence.


The knowledge of the principles of the Code of Ethics is certified by the signing of a declaration of knowledge by external collaborators and consultants.

By subscribing there declaration of which to the second comma, the collaborators external and the consultants commit to Not to put in to be any behavior suitable to induce the Company and its employees to violate the principles set forth in this Code.

The performance of conduct contrary to the expressed principles from the Code of Ethics is considered by the Company as a serious breach of the duties of correctness and good

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faith and a reason for damage to the relationship of trust. Consequently, if such behaviors occur, the company can decide to terminate contractual relationships for just cause

DIFFUSION OF THE ETHICAL CODE

The Company commits to disseminating this Code and any potential updates to recipients using the most appropriate methods from time to time. In particular, for example:

- a. transmission through e-mail/mail electronics certified/mail/delivery brevi manu to employees or to the collaborators/consultants external from the Company, foreseeing, if appropriate, their subscription of a declaration, with which to attest there reception, the recipient has read and accepted the Code;
- b. publication on the site Internet And on the net intranet corporate;
- c. information to the collaborators/consultants external occasional relative to existence and to the contents of the Code;
- d. insertion a clause into every stipulated contract to inform third parties about the existence of this Ethical Code. This ensures they accept it and commit, where applicable, to respecting the principles and rules of conduct contained within;
- e. predisposition of plans of training/information specific and differentiated to depending on the corporate role played by the recipient, which discloses the principles and rules of conduct on which the Company's activity is based.

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