



# Code of Ethics of T.O. Delta S.p.A.

## Sole Proprietorship

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## **1. Introduction**

### **Article 1 – Purpose and contents of the Code of Ethics**

This Code of Ethics (hereinafter the Code) identifies the general principles and rules of conduct which are recognised as having a positive ethical value.

The Code aims to direct the Company's actions towards ethical behaviour and enforce the principles found in the Charter of Values of T.O. Delta S.p.A. Sole Proprietorship (hereinafter referred to as the Charter) by introducing a set of behavioural rules which must be complied with to achieve the company mission.

In compliance with the principles of the Charter, the Code regulates the relevant conduct from an ethical perspective, with the aim of making T.O. Delta S.p.A.'s activity transparent and directing its development. This includes consideration of the Company's commitment to contribute to the socio-economic development of the area it operates in through organising and providing public services.

### **Article 2 – Recipients and dissemination of the Code**

The Code's provisions are binding for the conduct of all the Company's directors, managers, employees, consultants and anyone with which it establishes collaboration or partnership relationships for any reason, directly or indirectly, permanently or temporarily, in Italy or abroad.

Those the Code applies to are required to know the content of this document, observe its requirements and adapt their behaviour and actions to the principles expressed therein.

The Company undertakes to refer to compliance with the provisions of this Code in all economic relationships it establishes, and to disseminate it as widely as possible.

To this end, the Company makes the Code available, including by publishing it on its website, to all its interlocutors, including employees and collaborators of T.O. Delta S.p.A. Sole Proprietorship.

### **Article 3 – Effectiveness of the Code**

The behaviours prescribed by this Code assimilate, from an ethical perspective, the relevant conduct for accomplishing and correctly fulfilling the obligations of loyalty and diligence expected from managers and employees, as well as the general obligation of good faith required from collaborators of any kind and service providers.

Failure to comply with the conduct the Company explicitly attaches ethical value to is sanctioned proportionally, where applicable, from a civil, criminal and disciplinary perspective.

### **Article 4 – Implementing and updating the Code**

The Code is adopted by T.O. Delta S.p.A. Sole Proprietorship by resolution of its Board of Directors and can be modified and supplemented, including on the basis of suggestions, indications and proposals formulated by the Ethics Committee and the Supervisory Body provided for by Legislative Decree 231/01.

## **2. General ethical principles**

The Company's general ethical principles are those of transparency, correctness, efficiency, spirit of service, respect, collaboration between colleagues, professional development and competition.

The general ethical principles guide the work of all those subject to the provisions of the Code.

### **Article 5 – Transparency**

The principle of transparency is based on the truthfulness, clarity and completeness of information.

Compliance with this principle entails a commitment to provide the necessary information, both outside and within the Company, in a clear and complete manner, through verbal or written communication which can be understood easily and immediately, and after verifying the requirements of the information itself.

In the information given to customers and when formulating contracts, the Company communicates in a clear and understandable way, always ensuring an equal footing.

### **Article 6 – Correctness**

The principle of correctness entails respect from everyone, when carrying out their work and professional activity, for the rights of each person involved, beyond mere observance of the Law and the Employment Contract.

This respect is also to be understood in terms of privacy. This also requires the refusal of any situation that creates discrimination towards staff, or possible conflicts of interest between the Company and those who work in its interests.

### **Article 7 – Efficiency**

The principle of efficiency requires the best professional quality in each work activity according to the most advanced standards of each sector and activity profile.

The performance and delivery of services must always pursue the commitment to offer a service appropriate to the customer's needs and the most advanced economical standards in managing the resources used.

### **Article 8 – Spirit of service**

The principle of the spirit of service involves fundamentally sharing the company mission.

From this principle it follows that each person subject to the Code's provisions is constantly inspired, in their behaviour, to the ultimate goal of providing a service of high social value and utility to the community, which must benefit from the best quality standards, with the fairest economic and regulatory conditions, and without any arbitrary discrimination.

### **Article 9 – Professional development and collaboration between colleagues**

Human resources are the fundamental factor for company activities to develop and grow, and on this basis, the Company protects and promotes their professional growth in order to increase the wealth of skills possessed.

Conduct between employees, at all levels and degrees of responsibility, and between employees and collaborators, is constantly and mutually aimed at facilitating the best possible performance.

## Article 10 – Competition

The Company intends to develop the value of competition by operating according to principles of correctness, fair competition and transparency towards all operators on the market.

## 3. Criteria for conduct in relationships with stakeholders

### Article 11 – General principles

In carrying out its activities, the company acts in compliance with current legislation. All activities are carried out in compliance with the principles and procedures pre-established for this purpose.

The Company requires its directors, managers, employees, partners, and in general anyone who performs representative functions in any capacity, even de facto:

- to comply with current regulations and pre-established principles and procedures for this purpose
- to behave correctly so as not to jeopardise its moral and professional trustworthiness

The company therefore adopts measures necessary to ensure that the constraint of compliance with current legislation, as well as the principles and procedures pre-established for this purpose, is enforced internally and observed by its directors, managers and employees, as well as by its partners, suppliers, customers and anyone else in the context of relationships it maintains.

### Article 12 – Relationships with Customers

#### 12.1 Equality and impartiality

The Company undertakes to satisfy its customers in fulfilling the obligations established by current legislation, the Contract and the pre-established quality standards.

The company also undertakes not to discriminate against its customers, to establish a relationship characterised by a high level of professionalism, oriented towards availability, respect, courtesy, education, research and offering maximum collaboration.

#### 12.2 Contracts and communications with customers

Contracts and communications with customers must be:

- clear and simple, formulated in language as close as possible to that normally used by the interlocutors
- compliant with the regulations in force, without resorting to practices that are evasive or unfair in any way
- complete, so as not to overlook any element relevant to customers' decisions

The purposes and recipients of communications determine, as and when required, the most suitable contact channels to choose for sending content, which will be done without excessive pressure and solicitation and with the commitment to not using misleading or untruthful advertising tools.

Finally, T.O. Delta S.p.A. Sole Proprietorship is responsible for promptly communicating any information relating to:

- any contract changes
- any changes in the economic and technical conditions of service and/or sale

- the results of checks conducted in compliance with the standards required by the supervisory authorities



## **Article 13 – Relationships with Contractors**

T.O. Delta S.p.A. Sole Proprietorship carefully assesses the adequacy and feasibility of the services requested, with particular regard to regulatory, technical and economic conditions, so as to promptly detect anomalies. Under no circumstances does the Company take on contractual commitments that may necessitate it resorting to impermissible savings in terms of service quality, staff costs or occupational safety. In relationships with contractors, the company ensures correctness and clarity in commercial negotiations and when taking on contractual obligations, as well as their faithful and diligent fulfilment.

## **Article 14 – Relationships with Suppliers**

### ***14.1 Choice of supplier***

The methods for choosing suppliers are governed by principles common to the whole Group in accordance with the regulations in force.

The choice of supplier and purchases of tangible and intangible goods and services must be made in compliance with the principles of transparency, competition and equal conditions for those making offers, and on the basis of objective assessments regarding the competitiveness, quality, utility and price of the supply.

The company adopts objective and transparent selection criteria set out by current legislation and internal regulations, and does not preclude any supplier in possession of the required requirements from competing to be awarded a contract.

In selecting a supplier, the company must take into account its ability to guarantee the implementation of adequate company quality systems, the availability of resources and organisational structures, and the ability to satisfy confidentiality obligations. Each selection procedure must be carried out in compliance with the broadest conditions of competition, and any derogation from this principle must be authorised and justified in compliance with current legislation.

The company reserves the right to adopt a register of suppliers whose qualification criteria do not constitute barriers to entry.

### ***14.2 Transparency and integrity***

Relationships with suppliers are governed by appropriate procedures prepared by the Company and by the rules of this Code, to ensure maximum transparency. These relationships also include financial and consultancy contracts, which are also governed by the relevant provisions in force.

The stipulation of a contract with a supplier must always be based on extremely clear relationships which avoid any type of dependence. The company monitors the congruity of the services or goods supplied with the agreed fee. To this end, the following provisions are made:

- functional separation between the unit requesting the supply and the unit stipulating the contract
- an adequate system of document reconstruction to support the choices made
- the retention of information as well as official tender and contractual documents for periods established by current regulations and referred to in the internal purchase procedures

### *14.3 Protection of ethical aspects in supplies*

In its procurement activities, the company undertakes to promote compliance with environmental conditions and to ensure they are carried out in compliance with ethical and legal principles, requesting socially relevant requirements for particular supplies and services.

To this end, contracts with suppliers from countries at risk, defined as such by recognised organisations, include contractual clauses requiring:

- self-certification by the supplier of adherence to specific social obligations (e.g. measures that guarantee workers respect for fundamental rights, principles of equal treatment and non-discrimination, protection of child labour)
- the option to conduct control procedures at the supplier company's production units or operating offices, in order to verify that these requirements are met

### *14.4 Obligations for staff who deal with supplies*

#### *14.4.1 Impartiality*

Employees guarantee equal treatment of firms that come into contact with the company. They refrain from any arbitrary act that could produce negative effects on firms and from any preferential treatment; furthermore, they do not refuse or grant any services or treatment that are normally refused or granted to others.

#### *14.4.2 Confidentiality*

To protect the confidentiality of information communicated by firms that come into contact with the company, employees:

- refrain from disseminating and using information available for office reasons for personal purposes, without prejudice to compliance with the rules and regulations protecting the right to information and access
- carefully maintain the confidentiality of the entire tender procedure and the names of the competitors until awarding
- do not meet the participating firms during the tender unless expressly authorised to do so Any requests for information must be sent in writing and clarifications will be provided in the same manner to the requesting Company and the other participating firms.

#### *14.4.3 Independence and duty of abstention*

Employees do not perform any activity that conflicts with the correct fulfilment of office duties and avoid any involvement in situations that could harm the parties concerned or the company's image.

Employees make their managers aware of their participation in organisations or other bodies whose activities intersect with the progress of the office's own negotiations.

Employees operate autonomously and avoid making decisions or performing activities inherent to their duties in situations involving conflicts of interest, even if only apparent.

#### 14.4.4 Gifts and other benefits

Employees do not ask for or accept, for themselves or others, gifts or other benefits offered by suppliers, contractors or competing firms, or in any case firms interested in the supplies and contracts awarded by the company, except those of modest value occasionally given in the context of normal courtesy and international customs.

Employees do not accept benefits falling to the buyer for goods and services purchased for office reasons from the Company's suppliers, contractors and any contracting party, for personal and/or third-party use and/or advantage.

#### 14.4.5 Ancillary activities

Employees do not accept remuneration or other services in cash or in kind from any parties other than the company, nor do they accept collaborative assignments in any form and/or method.

Employees who intend to enter into private contracts with firms they have concluded procurement contracts with on the company's behalf give their manager prior written notice.

#### 14.4.6 Execution of the contract

Compliance with the contractual conditions is evaluated objectively and based on written documentation. The related accounting will be completed within the established timeframe.

### **Article 15 – Staff policies**

#### ***15.1 Employees' duties***

Each employee is asked to be familiar with the Code and the reference rules that regulate the activity, within the scope of their role.

Company employees are obliged to refrain from conduct contrary to these rules, to contact their superiors if they need clarifications on how to apply them, and to promptly notify their superiors or the Ethics Committee of any information on possible violations and any requests for them to act in violation of the rules. Those who receive such information are obliged to maintain confidentiality regarding the reporting party's identity.

It is the task of each Head of Company Unit/Department to act as an example for their employees with their own behaviour and decorum, and to prevent any type of retaliation.

#### ***15.2 Managers' duties***

Like all employees, managers are required to comply with current legislation, the Charter of Values and this Code. They are also required to monitor employees' compliance with the regulations and the Code, adopting the necessary measures and checks for this purpose. The checks are also carried out directly and with a frequency appropriate to the type of activity concerned.

Managers actively collaborate in every check carried out by the company or by administrative or judicial authorities.

#### ***15.3 Staff selection and recruitment***

Potential staff are assessed on the basis of the correspondence between candidate profiles and those sought and the company's needs, with respect for equal opportunities for all parties concerned.

The Human Resources Department, within the limits of the information available, adopts appropriate measures to avoid favouritism, nepotism or forms of clientelism in the selection and hiring phases, particularly avoiding blood or family ties between recruiter and candidate. Staff in charge of selections are required to declare the presence of their relatives among the candidates and abstain from the task.

Staff are hired with a regular contract and no form of irregular work is tolerated, nor any exploitation of particular forms of collaboration.

Once the employment relationship is established, each employee receives precise information on:

- the characteristics of their role and tasks
- regulatory and remuneration elements, as regulated by the national collective bargaining agreement and company contracts
- rules and procedures to adopt to avoid possible health risks associated with the work

This information is presented to employees so that they accept the assignment based on effective understanding.

#### **15.4 Staff management**

T.O. Delta S.p.A. Sole Proprietorship avoids any form of discrimination against its collaborators.

As part of the staff management and development processes, as well as during the selection phase, decisions are made based on the correspondence between the profiles sought and those of collaborators (e.g. in the case of promotion or transfer) and/or based on merit (e.g. allocation of incentives based on results achieved).

Access to roles and positions is based on personal skills, abilities and attitudes; moreover, in line with general work efficiency, priority is given to flexible work organisation which helps manage maternity and general childcare.

Within the limits of the information available and the protection of privacy, the human resources department works to prevent forms of nepotism (e.g. by avoiding relationships of hierarchical dependence between collaborators with family ties).

#### **15.5 Human resource development and training**

Managers use and fully exploit all the professional skills in the company by activating the levers available to encourage their collaborators to develop and grow (e.g. *job rotation*, support for expert staff, experiences aimed at taking on positions of greater responsibility).

In this context, it is particularly important for managers to communicate collaborators' strengths and weaknesses so that the latter can aim to improve their skills, including through targeted training.

T.O. Delta S.p.A. Sole Proprietorship undertakes to give all collaborators access to information and training tools, at home and remotely, with the aim of enhancing its staff's specific skills and professional abilities.

Training is administered to groups or individual collaborators on the basis of specific professional development needs. With regard to distance training (provided through the internet, intranet or CD-ROM), each collaborator can make use of it based on their own interests and outside normal working hours. Employees receive institutional training at certain points throughout their company lives (e.g. new recruits are given an introduction to the Company and its business) and operational staff receive ongoing training.

## *15.6 Health and safety*

T.O. Delta S.p.A. Sole Proprietorship undertakes to spread and consolidate a culture of safety by building awareness of risks and promoting responsible behaviour by all employees. It also works to protect workers' health and safety, especially through preventive actions, as well as the interests of other stakeholders.

The objective of T.O. Delta S.p.A. Sole Proprietorship is to protect the Group's human, asset and financial resources, constantly seeking the necessary synergies not only within the Company, but also with suppliers, businesses and customers involved in the Group's activities.

To this end, a comprehensive internal structure, attentive to how the relevant scenarios evolve and how threats consequently change, carries out technical and organisational actions by:

- introducing an integrated risk and safety management system
- continuously analysing the risk and critical issues of the processes and resources to be protected
- adopting the best technologies
- checking and updating work methods
- providing training and communication activities

T.O. Delta S.p.A. Sole Proprietorship works to continuously improve the efficiency of the company structures and processes that contribute to the continuity of the services provided.

## *15.7 Personal protection*

The company protects its employees' moral integrity by guaranteeing the right to working conditions that respect personal dignity. Sexual harassment is not allowed, and behaviour or discourse that may disturb personal sensitivity should be avoided. Therefore, the text of the "Regulations for protecting the dignity of women and men within the company" approved in agreement with the trade unions on 24 October 1997 is understood to be transposed into this Code.

Discrimination based on age, sex, sexuality, race, health, nationality, political opinions or religious beliefs is not tolerated. The company protects workers from acts of psychological violence, and opposes any discriminatory or harmful behaviour or conduct towards people, their beliefs and preferences.

## *15.8 Information management*

Each employee must know and implement the provisions of company policies regarding information security to guarantee the information's integrity, confidentiality and availability.

Employees are each required to draw up their documents using clear, objective and exhaustive language, allowing any checks by colleagues, managers or external parties authorised to request them.

T.O. Delta S.p.A. Sole Proprietorship also protects each employee's privacy, in accordance with legal provisions, and adopts standards that prohibit – subject to the exceptions provided by law – communicating and disseminating personal data without the prior consent of the party concerned and establish the rules for controlling privacy protection rules.

Any form of investigation into anyone's ideas and their private life in general is not permitted.

### **15.9 Conflict of interest**

Everyone is required to avoid situations in which conflicts of interest may arise and to refrain from personally taking advantage of business opportunities they become aware of while performing their duties.

The following situations can lead to a conflict of interest:

- holding a top management position (CEO, director, department head) and having economic interests with suppliers, customers, or competitors (possession of shares, professional appointments), including through family members or relatives
- dealing with relationships with suppliers and customers and the performance of work activities there, including by close and distant relatives
- accepting money or favours from people or companies that have or intend to enter into business relations with the Group

If a conflict of interest occurs, even if only apparently, employees are required to communicate this to their manager who, in the manner envisaged, informs the Ethics Committee, which evaluates its actual existence on a case-by-case basis. Employees are required to provide information about activities performed outside working hours, if they may appear to be in conflict of interest with the company.

### **15.10 Use of company assets**

Each employee is required to work diligently to protect company assets, through responsible behaviour in line with the operating procedures set up to regulate their use, and document their use precisely. In particular, each employee must:

- avoid private use of company assets
- scrupulously and sparingly use the assets entrusted to them
- avoid improper use of company assets that may cause damage or reduce efficiency, or in any case go against the Company's interests

Each employee is responsible for protecting the resources entrusted to them and has the duty to promptly inform the Units in charge of any threats or damaging events for the Group.

Regarding IT applications, each employee is required:

- to use them according to the instructions and for the purposes for which they are made available
- to scrupulously adopt the provisions of company security policies, in order not to compromise the functionality and protection of IT systems
- not to send threatening or abusive emails, not to use crude language, not to express inappropriate comments that may offend people and/or damage the company's image
- not to browse websites with indecent or offensive content

## **Article 16 – Relationships with Shareholders**

T.O. Delta S.p.A. Sole Proprietorship is aware of the importance of the role of shareholders and undertakes to provide them with accurate, truthful and timely information, and to improve the conditions for them to participate in company decisions.

It is T.O. Delta S.p.A. Sole Proprietorship's commitment to protect and increase the value of its business, in face of the commitment made by shareholders with their investments, by enhancing management, pursuing high standards in productive

uses and protecting its assets. The company guarantees equal treatment for all categories of shareholders, avoiding preferential behaviour.

### ***16.1 Accounting and company information***

Accounting transparency is based on the truth, accuracy and completeness of the basic information for the related accounting records. All employees must collaborate to ensure that management affairs are recorded correctly and promptly in the accounts.

For each transaction, adequate supporting documentation of the activity is kept on file in order to:

- facilitate bookkeeping
- identify the different levels of responsibility
- enable all transactions to be accurately reconstructed, which also helps reduce the likelihood of misunderstandings

Each record must reflect exactly what is shown in the supporting documentation. It is every employee's task to ensure that the documentation is easily traceable and ordered according to logical criteria.

Employees who become aware of omissions, falsifications or neglect in the accounting or documentation on which the accounting records are based are required to report the facts to their superior or the Supervisory Body.

## **Article 17 – Institutional relationships**

Any relationship with state or international institutions can only be traced back to forms of communication aimed at assessing the implications of legislative and administrative activity towards the company, responding to informal requests and inspection union acts (questions, interpellations, etc.) or in any case to disclose the position on issues relevant to the Group.

To this end, the company undertakes to:

- establish, without any form of discrimination, stable channels of communication with all institutional interlocutors at the international, community and domestic levels
- represent the interests and positions of Group companies in a transparent, rigorous and consistent manner, avoiding collusive attitudes

To ensure maximum clarity in relationships, contact with institutional interlocutors takes place exclusively through representatives who have received explicit mandates from top management.

## **Article 18 – Relationships with the Public Administration**

### ***18.1 Integrity and independence in relationships***

Only assigned and authorised departments can enter into commitments with the Public Administration and Public Institutions, in compliance with the most rigorous observance of the applicable laws and regulations, and these cannot in any way compromise the Group's integrity and reputation. For this reason, documentation relating to contact with the Public Administration must be collected.

The following applies to employees of the Public Administration or officials who act on behalf of the Public Administration:

- active or passive corruption or collusive conduct of any nature or in any form are not allowed

- it is prohibited to offer money or perform acts of commercial courtesy (e.g. providing gifts or forms of hospitality) to executives, officials or employees of the Public Administration or their relatives, except in the case of benefits of modest value, which cannot in any way be interpreted as instrumental to receiving illegitimate favours, and in any case must comply with the pre-established company procedures.
- it is forbidden to make payments, even indirectly, to public officials and third parties in general to obtain more favourable treatment or to influence an official act to bring about illegitimate favours (both illicit payments to entities or their employees and illicit payments made through persons acting on behalf of these entities are considered to be acts of corruption); it is also forbidden to promise employment opportunities, advantages or other benefits
- in the course of business negotiations or relations with the Public Administration, the assigned staff must not try to improperly influence the counterparty's decisions, including those of officials who negotiate or make decisions on behalf of the Public Administration
- in the specific case of tenders with the Public Administration, it is essential to operate in compliance with the law and correct commercial practice
- the Company must not be represented by a consultant or third party towards the Public Administration when conflicts of interest may arise

Any violation or simple attempt made by the Company or third parties must be promptly reported to the competent internal functions.

## **Article 19 – Relationships with Political Parties, Trade Unions and Associations**

T.O. Delta S.p.A. Sole Proprietorship does not provide loans, contributions, advantages or other benefits, directly or indirectly, to political or trade union parties, movements, committees or organisations, or their representatives and candidates, except in compliance with the applicable legislation, with full transparency, and only upon express intervention and authorisation by the Administrative Body. T.O. Delta S.p.A. Sole Proprietorship refrains from conduct aimed at exerting direct or indirect pressure on political representatives and does not make contributions to organisations with which a conflict of interest may arise.

The company also cooperates financially with non-political associations for specific projects, based on the following criteria:

- purposes in line with the company mission
- clear and documentable allocation of resources
- express authorisation from the departments responsible for managing these relationships within the company

## **Article 20 – Contributions and sponsorship**

The company can respond to requests for contributions limited to proposals from bodies and associations declared to be non-profit and with regular statutes and articles of association, which are of high cultural, social or beneficial value or in any case involve a significant number of citizens.

Sponsorship activities, which may concern social, environmental, sports, entertainment and art matters, are intended only for events that offer quality assurance or for which the company can collaborate in the design, so as to guarantee its originality and effectiveness.

In any case, in choosing which proposals to take up, the company pays particular attention to any possible conflict of interest of a personal or business nature (for example, kinship with the parties concerned or links with bodies that can,

due to the tasks they perform, favour the Group's business in some way).



## Article 21 – Sustainability

T.O. Delta S.p.A. Sole Proprietorship has embarked on the path of sustainability which consists in progressively assimilating care of the social and environmental aspects of its business with company strategies.

Attention to these aspects takes on special importance given the particular nature of the services provided: water and energy are essential commodities that significantly impact quality of life in the communities served and have, by their nature, strong environmental implications.

## Article 22 – The environment

The environmental policy is defined and implemented in a united and coherent way throughout the Group, and the guidelines for implementing the environmental policy are taken as a reference by the Group companies.

T.O. Delta S.p.A. is attentive to environmental problems and aware of the environment's strategic role as a tool for optimising the company.

In addition, T.O. Delta S.p.A. Sole Proprietorship undertakes to adopt strategies aimed at continuously improving results in the field of environmental protection and management, concentrating efforts on preventing pollution and minimising environmental risks, and operating in line with the following principles:

- sustainable management of natural resources and energy, optimising their use, paying particular attention to waste reduction and rational use by the consumer and increasing the use of renewable sources
- designing and implementing production processes and company activities with criteria aimed at preventing pollution, reducing environmental impacts, preventing possible accidents, safeguarding the health and safety of employees and the population, adopting for this purpose the best techniques available on the market and checking their reliability in the plants' operation and maintenance
- maintaining and supporting the commitment to continuously improving results in the field of environmental protection and management, defining environmental objectives and adopting improvement programmes, aimed in particular at optimising efficiency in the collection, distribution and purification of water resources, minimising odour emissions, controlling and reducing atmospheric and electromagnetic emissions, containing waste in the electricity distribution network, minimising the visual and acoustic impact of company plants, and reducing, recovering and reusing the waste produced
- operating through a system that is as integrated as possible to manage safety and the environment, inside and outside the workplace
- ensuring compliance with current environmental and safety legislation and constant updates on developments in the environmental legislative and regulatory landscape
- raising awareness, training and properly instructing the various levels of staff, to obtain involvement from all personnel, in order to achieve high levels of professionalism and performance quality for safety, environment and health issues, pursuing an increased awareness and sense of responsibility throughout the entire Company

- establishing and maintaining a dialogue, supported by the commitment to maximum collaboration, with local organisations, representative bodies, corporate structures and any other party concerned, both internal and external, through information reporting and periodic, clear and transparent communication concerning company strategies and results achieved in terms of safety, health and environmental protection

The sense of responsibility, behaviour and attitudes towards company aspects concerning correct management of environmental, health and safety issues constitute an integral part of each employee's role and therefore a significant element for judging employees' performance and the quality of that rendered by third parties.

## **4. Methods of implementation and control of the Code of Ethics**

### **Article 25 – Violation of the Code of Ethics**

All parties concerned, internal and external, are required to report any non-compliance with the Code in writing. Anonymous reports are not permitted.

Reports must be submitted to the Supervisory Body and/or the employee's superior, following the methods outlined by internal procedures.

The Supervisory Body and/or the company representative appointed for this purpose will listen separately to the report's author and the person responsible for the alleged violation. Reports which are clearly unfounded will be subject to sanctions.

The Supervisory Body and T.O. Delta S.p.A. Sole Proprietorship undertake to protect the authors of reports against any retaliation they may face and to keep their identity confidential, except for specific legal obligations.

### **Article 26 – Sanctions**

Any violation of the principles contained in this Code, which also constitutes a disciplinary offence, gives rise to an immediate disciplinary procedure, regardless of any initiation of criminal proceedings in cases where the behaviour itself also constitutes a crime.

In the case of violation by managers, the most suitable measures will be applied in compliance with the provisions of the National Collective Agreement for Industrial Managers.

In the sphere of contracts for professional collaboration and supply of goods, services and work, express termination clauses will be included for conduct contrary to the principles of this Code.

### **Article 27 – Violations of the Code of Ethics related to Legislative Decree 231/01**

The adoption of ethical principles relevant to preventing offences pursuant to Legislative Decree 231/01 constitutes an essential element of the preventive control system.

To this end, the behavioural rules provided for in the Code constitute a basic reference which recipients must comply with in relationships with interlocutors, among which the most important are the Public Administration, both Italian and foreign, and public employees.