



# **C.R. TECHNOLOGY SYSTEMS SPA**

## **“CODE OF ETHICS”**

## **1. Perimeter and scope of application**

The main goal for C.R. Technology Systems S.p.A. is to be an Italian top-class company in the field of design, engineering and construction of electrical substations, e-Houses, switchgear and energy generation plants from renewable sources.

This Code of Ethics represents the standards and behavioral values which the Companies and the recipients listed below must comply with.

The Company undertakes to promote, in relations with the companies over which it exercises direct control, the dissemination and compliance with the principles contained in this Code, by complying with the rules of conduct defined therein.

Recipients of the information written in the Code are C.R. Technology Systems S.p.A. employees, with any role and position, partners, trainees, employees of other companies who work even temporarily at C.R. Technology Systems S.p.A., administrators, auditors, attorneys, consultants, agents, brokers, characteristic suppliers, contractors, directly controlled companies and any person operating in the name and on behalf of C.R. Technology Systems S.p.A.

It is a duty of all recipients to know the content of this Code, understand its meaning and, if necessary, ask for clarification on the same, as reported in the section "Implementation procedures" of this document.

The Company undertakes to inform all the subjects who for various reasons are interested in the controlling of the Code or with respect to which there is an interest in the Company itself to be informed of the provisions and principles underlying it.

## **2. Principles in business management**

### **Fairness and honesty**

C.R. TECHNOLOGY SYSTEMS carries out its activities according to the principles of correctness and honesty. All persons who directly or indirectly carry out any activity for the Company, or on its behalf, are required to operate in compliance with these principles.

In particular, the recipients of the Code have to take note and scrupulously and fully observe the following behavioral rules:

- Fraudulent behaviors and conduct, acts of corruption, favoritism and, more generally, conduct contrary to the law, to sector or internal regulations and to the provisions of this Code are prohibited;
- for any reason, the giving and receipt of any gift that can even be interpreted as

exceeding normal commercial or courtesy practices, or that can be interpreted as aimed at acquiring favorable treatment for oneself or in carrying out activities that can be connected to the Company, are not allowed for any reason.

Such conduct is forbidden and will be sanctioned, regardless of whether it was carried out or attempted, directly or through third parties, to obtain personal benefits, for others or for the Company.

### **Impartiality**

In the exercise of any activity C.R. TECHNOLOGY SYSTEMS avoids any discrimination based on age, sex, sexuality, state of health, race, nationality, political and religious opinions, towards its interlocutors.

### **Respect for the fundamental rights of workers**

C.R. TECHNOLOGY SYSTEMS respects human rights and promotes their observance, in accordance with the principles sanctioned by the International Labor Organization. All partners have the right to establish trade unions and to appoint employee representatives. The company refuses to intentional use of forced or obligatory labor and pays attention to the minimum age requirements for employment in accordance with governmental obligations. Child labor is forbidden.

Relationships with workers are disciplined in compliance with the regulations of the National Collective Labor Agreement.

### **Respect of the law**

C.R. TECHNOLOGY SYSTEMS considers compliance with laws and regulations a main value in the exercise of each activity of the Company.

Each recipient has to carry out their duty in full compliance with the reference regulatory framework.

The Company will not initiate or continue any relationship with anyone who refuses to adopt and comply with this principle. This also applies, even more, to malicious or negligent conduct contrary to the law which, carried out by individuals, can generate a benefit, an interest or an advantage for the Company.

Any conduct that could integrate a relevant behavior of any type of crime is to be considered prohibited, in particular if contemplated by Legislative Decree 231/01 and subsequent amendments and additions.

### **Respect for Company rules**

C.R. TECHNOLOGY SYSTEMS provides and makes available, within its organization, corporate rules in full compliance with workers' rights, the provisions in force and the collective agreement of reference. Each worker has to document and comply with these requirements, according to his/her duties and position.

### **Accuracy in accounting records and extraordinary transactions**

Each operation and transaction must be correctly recorded, authorized, auditable, legitimate, consistent and congruous. The recipients, if they become aware of omissions, falsifications or inaccuracies in the accounting records or in the deeds attributable to them, must promptly inform the Board of Statutory Auditors and the Supervisory Body.

Il bilancio e le altre comunicazioni sociali devono garantire ai soci e ai terzi un'informazione veritiera, completa e corretta sulla situazione economica, finanziaria e patrimoniale nel suo complesso.

In defining and managing extraordinary transactions, the Company undertakes to respect the right to safeguard the integrity of the assets as a guarantee for creditors.

### **Labor, health and safety protection**

The Company undertakes to respect and to request compliance by its suppliers with the current legislation concerning labor protection and promotes responsible behavior on the part of its partners, providing adequate tools for the prevention of accidents at work to safeguard the health of personnel.

### **Environment protection**

C.R. TECHNOLOGY SYSTEMS undertakes to produce and market goods and services with minimal impact on the environment and to invest sources in the development of new technologies.

The Company also promotes virtuous behaviors on the part of collaborators so that they make adequate and economical use of natural resources and ensure that the activities they carry out impact the environment as little as possible.

### **Quality policy**

C.R. TECHNOLOGY SYSTEMS recognizes the Quality Certification as a tool for achieving corporate objectives. All collaborators are responsible for operating and taking steps to

ensure that the Quality policy is continuously observed.

### **Respect for privacy and data protection**

C.R. TECHNOLOGY SYSTEMS guarantees the processing of personal and sensitive information in its possession relating to its collaborators, business partners, clients and suppliers in full compliance with the relevant legislation; for this purpose, it actuates adequate measures to protect the inviolability of the data and their correct treatment.

## **3. Behavior and conduct guidelines**

### **Customer**

C.R. TECHNOLOGY SYSTEMS recognizes as its primary objective the satisfaction and protection of the customer in its broadest meaning. In order to provide an adequate service to customer requests and needs, it is necessary that everyone does their utmost to always maintain an honest, collaborative and respectful relationship, with the sole purpose of increasing customer satisfaction, which must be constantly monitored.

Each collaborator must, therefore, act according to some fundamental rules, such as:

- always act with kindness, helpfulness and courtesy;
- to establish procedures and behaviors in order to provide an adequate information and support service, that ensures minimum response time and uses available communication channels;
- to guarantee maximum availability;
- to maintain a problem-solving attitude.

### **Suppliers and partners**

C.R. TECHNOLOGY SYSTEMS operates in research and selection processes of its suppliers and partners, according to objective and documentable criteria of competitiveness and quality, in line with the principles set out in the Code, also undertaking to treat them fairly and to guarantee, in general, the respect of free competition without any distortion.

Collaborators involved must orient their work in relations with suppliers and partners according to loyalty, transparency and honesty; the Company also expects that its suppliers and partners to work in full compliance with the principle of fair competition.

## **Collaborators**

C.R. TECHNOLOGY SYSTEMS recognizes the importance and value of its collaborators intended as: employees, staff in temporary work, trainees and those with whom it undertakes an employment relationship according to the forms provided by law. Employees are a fundamental and indispensable asset of the company; the company is fully aware, in fact, that, only thanks to the work of its staff, it has been possible to achieve and will be able to improve the excellent results that characterize it within its reference market. For these reasons, in particular it undertakes to:

- maintain within the organization structure a suitable climate for the human and professional growth of its collaborators;
- respect dignity, professionalism, health and safety of its collaborators;
- act in full compliance with the current legislation and the National Collective Agreement;
- enhance staff and support their training and professional development;
- favor a working environment characterized by dialogue and mutual comparison.

## **Equal opportunities**

C.R. TECHNOLOGY SYSTEMS undertakes not to engage in any discriminatory behavior concerning the selection and hiring of personnel, the assignment of tasks and duties, the training, the remuneration and the professional growth.

## **Respect and cooperation**

C.R. TECHNOLOGY SYSTEMS believe that the quality of relations among its collaborators is a fundamental value and considers it necessary that all personnel operates within a work environment that allows everybody to fully express their potential; for this reason anyone who works in the Company is required to act accordingly to the general principles expressed in the previous chapter and, in particular, to:

- respect the work of others and facilitate the activities of all interlocutors with whom we have professional relationships within the organizational structure;
- collaborate with colleagues in order to achieve company objectives in the best possible way;
- contribute to maintain a peaceful atmosphere within the workplace;
- refrain from engaging in any kind of discrimination.

C.R. TECHNOLOGY SYSTEMS considers collaboration between different departments a priority, in order to achieve the planned company results.

For this reason, it is required to anyone who works in the Company, to contribute to maintain high levels of collaboration and communication between different departments, pursuing the common goal of success of the company, even maintaining its peculiarity of tasks and objectives assigned to every role.

### **Development and training of human resources**

C.R. TECHNOLOGY SYSTEMS works to enhance the competence and professionalism of the staff through training, updating and development tools for the growth of collaborators.

### **Management**

Each manager represents a role model and must act in strict compliance with the Code, with the task of promoting and disseminating principles and values of the same Code among their collaborators.

Each manager is responsible for his own collaborators. The relationship must be based on mutual respect.

Managers must guarantee support and an adequate information flow, agree on clear, ambitious and realistic objectives and promote the professional development of employees.

### **Confidentiality and treatment of confidential information**

The confidentiality of data, of communication and of knowledge is guaranteed by the current legislation. The personnel and external collaborators are prohibited from disseminating confidential information that they have become aware of in the context of their functions, regarding C.R. TECHNOLOGY SYSTEMS and its interlocutors.

### **Conflict of interest**

C.R. TECHNOLOGY SYSTEMS undertakes to avoid any situation of conflict of interest in compliance with the relevant legal provisions. All collaborators are required to avoid situations of personal advantage related to the exercise of their work activities. Any situations of potential conflict of interest must be communicated to the company management. The following are, by way of example but not limited to, situations attributable to this case:

- hold professional positions outside the company without the authorization of the

company management;

- carry our personal activities during the working hours;
- use corporate assets for personal purposes;
- have holdings in companies that have professional relationships with C.R. TECHNOLOGY SYSTEMS without having communicated it to the company management.

### **Behavioral duties of collaborators**

Each collaborator must operate in the respect of dignity, professionalism, healthy, and safety of its colleagues;

Each collaborator must behave in full respect of the dignity, professionalism, health and safety of their colleagues; he must also pay attention to the personal aspect, both on and off-site, so that they are consonant and adequate for the position held. Each collaborator is required not to adopt behaviors that could in any way harm the image and reputation of C.R. TECHNOLOGY SYSTEMS.

### **Treatment of company assets**

Each collaborator, in receiving a company asset, undertakes to use it with the due diligence and scrupulously comply with the rules governing its use, according to the specific characteristics of the asset.

All company assets must be considered work tools and be used for this purpose only.

In no case it is allowed to use company assets and, in particular, informatic and web resources, for purposes contrary to mandatory rules of law, public order or morality, as well as to commit crimes, induce the commission of crimes, incite racial hatred, incite violence and violate human rights.

### **Presents and gifts**

As part of the performance of their duties, each collaborator is not authorized to receive or offer gifts, if not of a value less than € 50.00, and, in any case, which are purely symbolic and which can be traced back to normal courtesy relationships, this exception does not apply in relations with national and / or international PAs and their officials.

### **Institutions and Public Administration**

C.R. TECHNOLOGY SYSTEMS operates, in Italy and abroad, in relationship with



institutions and the Public Administration, understood as public employees (public officials or persons in charge of public service), private business interlocutors in the case of public service concessionary bodies, according to principles of fairness and transparency in order to guarantee conduct clear that they cannot be interpreted by the parties involved as ambiguous or contrary to current regulations.

More specifically:

- it is not allowed to offer money or presents to managers, officials and employees of the Public Administration or to their relatives, both in Italy and abroad, ~~except in the case of gifts of modest value, which have a symbolic nature and can be traced back to normal courtesy relationships;~~
- in the course of any relationship with the Public Administration the personnel in charge can not try to influence the decisions of the counterparty;
- in the event of a tender with the Public Administration it will be necessary to operate in compliance with the law and the correct commercial practice;
- the Company must not be represented, in relations with the Public Administration, by a consultant or other "third party" when conflicts of interest may arise.

### **Labor organizations**

C.R. TECHNOLOGY SYSTEMS interacts with the trade union organizations on the basis of principles of correctness, transparency and collaboration, within the framework of legislative provisions and the National Collective Agreement.

### **Mass media and information organs**

C.R. TECHNOLOGY SYSTEMS respects and observes freedom of expression and the right of information and recognizes the importance of mass media as means of disseminating information to civil society.

All collaborators, in compliance of existing procedures and in accordance to their role in the Company, are responsible for all the information conveyed to external interlocutors.

### **Educational institutions and universities**

C.R. TECHNOLOGY SYSTEMS contributes to the strengthening of the link between the training system and the company, through the continuous collaboration with the bodies responsible for the training of young people.

## **4. Methods of implementation**

### **Supervisory Body**

The Company, in compliance with the Legislative Decree 231/2001 has adopted its own organization, management and control model that includes the procedures and control currently in force.

It is the duty of the Supervisory Body to supervise the observance and correct application of the principles set out in this Code of Ethics.

### **Availability of the Code of Ethics**

The Code of Ethics, and any subsequent amendments or integrations, is published on the Internet website of the Company and hard copies are available at the company direction.

Moreover, the Company carries out specific education and communication activities with the appropriate tools for the recipients of the Code and all the other subjects who are interested in the contents of the Code for various reasons.

### **Reporting of violations**

Anyone who becomes aware of behaviors that could be configured as violations of the current Code rules, is required to report them, through paper or electronic mail to the e-mail [odvcrtechnologysystems@gmail.com](mailto:odvcrtechnologysystems@gmail.com) to the Supervisory Body.

For each report, the confidentiality of the report of violations of the Code of Ethics will be guaranteed.

### **Application of the Code and disciplinary consequences**

Violations of the rules of conduct of this Code by employees may result in the application of disciplinary sanctions, in accordance with the rules of the law, of the National Collective Labor Agreement (hereinafter, the "CCNL") and of the same Code.

Once a possible violation of this Code, or of other policies adopted by C.R. TECHNOLOGY SYSTEMS, the Company will open the related proceedings against the employee through the holder of the disciplinary power in accordance with the terms and conditions set out in art. 7, L. 300/70 and of the CCNL.

In particular, disciplinary violations of the CCNL rules and any company regulations and the Code of Ethics will be assessed on the basis of the gravity of the same and the recurrence / repetitiveness over time of actions in violation of the rules imposed on the employee in the execution of his activities, pursuant to art. 7 of the workers' statute.

Without prejudice to what is stated in the paragraph relating to the "Contractual value of the Code", the delivery and compliance with the provisions and principles set out in this Code by third parties to the Company, with which the same has relationships of collaboration, professional advice or commercial partnership, represents a sine qua non for the stipulation of contracts.

The specific provisions contained in the Code, signed by these subjects or, in any case, also approved for conclusive facts by the same pursuant to the previous paragraph, constitute an integral and substantial part of the contracts entered into by them with the Company.

Any violations by third parties of specific provisions of the Code will legitimize the interruption by the Company of existing contractual relationships and will constitute grounds for termination, even if expressly, of the contract pursuant to art. 1456 and following of the Civil Code.

In this sense, C.R. TECHNOLOGY SYSTEMS will provide adequate information to all staff and to all third parties with whom it is in a relationship concerning the aforementioned obligation.

The President  
(ROVELLI Carlo)