

# Code of Ethics

**TIENG S.r.l.**



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INDEX

PREMISE .....	4
1.1 Purpose and content .....	4
1.2 The relationship with stakeholders .....	4
1.3 The value of corporate reputation and credibility.....	5
1.4 Contractual value of the Code.....	5
1.5. Code Updates.....	5
PART I "GENERAL PROVISIONS" .....	7
Art. 1 – Nature of the Code of Ethics .....	7
Art. 2 – Scope and Recipients .....	7
PART II "ETHICAL PRINCIPLES OF REFERENCE" .....	8
Art. 3 – Legality and Responsibility .....	8
Art. 4 – Principle of loyalty.....	8
Art. 5 – Value of the person.....	8
Art. 6 – Fairness, loyalty and collaboration.....	9
Art. 7 – Impartiality and the principle of non-discrimination.....	9
Art. 8 – Conflict of interest .....	9
Art. 9 – Health and safety.....	10
Art. 10 – Environment and sustainable development.....	10
Art. 11 – Confidentiality of information.....	11
Art. 12 – Protection of company assets.....	11
Art. 13 – Protection of the name and logo .....	11
Art. 14 – Gifts, gifts and benefits .....	12
Art. 15 – Efficiency.....	12
Art. 16 – Spirit of service.....	12
Art. 17 – Enhancement of human resources.....	12
Art. 18 – Internal control system.....	12
Art. 19 – Relationship with Members.....	13
PART III "RULES OF CONDUCT" .....	14
Chapter I "Relations with employees and collaborators" .....	14
Art. 20 – Selection and management of employees and collaborators and the working environment.....	14
Art. 21 – Training and evaluation of employees .....	15
Art. 22 – Obligations and duties of employees .....	15

Chapter II "Relations with the Public Administration" .....	17
Art. 23 – Legality and impartiality .....	17
Art. 24 – Business negotiations .....	17
Art. 25 – Contributions, subsidies and permits .....	18
Art. 26 – Gifts, gifts, sponsorships .....	18
Chapter III "Relations with suppliers" .....	19
Art. 27 – Choice of supplier .....	19
Art. 28 – Transparency, equality, loyalty, diligence in the execution of contracts and free competition .....	19
Art. 29 – Knowledge of and compliance with the Code of Ethics .....	20
Chapter IV "Relations with external collaborators and consultants" .....	20
Art. 30 – Fairness, good faith and loyalty .....	21
Art. 31 – Knowledge of and observance of the Code of Ethics .....	21
Chapter V "Relations with customers" .....	22
Art. 32 – Transparency and fairness .....	22
Art. 33 – Contracts and communications .....	22
Art. 34 – Customer satisfaction .....	22
Art. 35 – Quality of products .....	23
PART IV "EFFECTIVENESS OF THE CODE OF ETHICS" .....	24
Art. 36 – Dissemination of the Code of Ethics .....	24
Art. 37 – Effectiveness of the Code of Ethics and sanctions .....	24
PART V "IMPLEMENTATION AND CONTROL ARRANGEMENTS" .....	25
Art. 38 – Establishment of the Supervisory Body .....	25
Art. 39 – Audit Functions .....	25
Art. 40 – Whistleblowing .....	25
Art. 41 – Disciplinary system .....	26
PART VI "FINAL PROVISIONS" .....	28
Art. 42 – Adoption of the Code of Ethics .....	28

## **PREMISE**

### **1.1 Purpose and content**

The Code of Ethics of **Tieng S.r.l.** (hereinafter also referred to as "**Tieng**" or the "Company" or "The Company") aims to establish the rules governing the ethical behaviour of all recipients, as defined below, in the daily performance of their work.

It expresses the set of values and principles of conduct that inspire the activity of the entity.

It recommends, promotes, or prohibits conduct, calling for compliance from those within the Company.

It informs external parties about the principles of corporate ethics that the Company recognizes as its own and expects compliance from its interlocutors (both internal and external to the Company).

It provides for penalties proportionate to the seriousness of the infringements committed and constitutes a valid code of conduct to increase employees' awareness and knowledge of company policies.

All the principles set out herein, subject to verification of compatibility with the nature and methods of each relationship, will be extended to the relationships between Tieng and its contractors, subcontractors, suppliers, consultants, employees, partners and trainees with or without remuneration, in accordance with the regulations and legislation in force.

The Code is widely disseminated internally by posting it in a place accessible to all, published and downloadable from the company website and made available to any company interlocutor.

The Company also undertakes to ensure compliance with the provisions of this Code in all economic relations established by it in the context of its activities.

### **1.2 The relationship with stakeholders**

The Code aims to direct the company's conduct towards cooperation and trust with stakeholders, i.e., those individuals, groups, and institutions whose contributions are necessary for achieving the corporate mission and/or whose interests are directly or indirectly influenced by Tieng's activities.

A personal commitment to respect the law, honesty, loyalty to the Company and transparency is therefore required.

### **1.3 The value of corporate reputation and credibility**

Reputation and credibility are fundamental intangible assets. A good reputation and corporate credibility favor investments, relationships with local institutions, customer loyalty, human resource development, and the fairness and reliability of suppliers.

In any business activity, conduct that is not based on ethics compromises the trust relationship between the Company and its stakeholders. Therefore, any conduct or attitude by individuals or organizations, whether internal or in external collaboration with the Company, that seeks to procure an undue advantage or interest for themselves, Tieng, or a company controlled or affiliated with it, is unethical and encourages hostile and non-transparent conduct towards Tieng.

Unethical behavior is defined as conduct that violates legal regulations or is in contrast with internal regulations and procedures.

### **1.4 Contractual value of the Code**

Compliance with the provisions of the Code must be considered an essential part of the contractual obligations of the company's employees pursuant to and for the purposes of articles 2104, 2105 and 2106 of the Civil Code.

Serious and persistent violation of the rules of this Code damages the relationship of trust established with the company and may lead to disciplinary actions and compensation for damages, without prejudice, for employees, to compliance with the procedures provided for by art. 7 of Law 300/1970 (Workers' Statute) and collective labour agreements.

### **1.5. Code Updates**

The Code may be amended and supplemented by resolution of the Board of Directors, also on the basis of suggestions and indications from the Supervisory Body.

This Code of Ethics is structured in five parts:

- PART I, dedicated to the general provisions, which indicates the nature, scope and recipients of the Code of Ethics;
- PART II, which explains the ethical principles of reference, i.e. those values considered fundamental by the Company, to which all Recipients must comply and be inspired in the pursuit of the company's purposes;
- PART III, which dictates the rules of conduct, to which those who work in Tieng must comply in carrying out their activities;
- PART IV describes the tools to ensure the effectiveness and application of the Code of Ethics;

## **TIENG S.r.l.**

- PART V provides for the control mechanisms for the implementation of the Model and the Code of Ethics;
- PART VI, relating to the final provisions.

## **Part I "General Provisions"**

### **Art. 1 – Nature of the Code of Ethics**

1. This Code of Ethics (hereinafter also the "Code") has been drawn up, pursuant to Legislative Decree no. 231 of 8 June 2001 and in accordance with the Confindustria Guidelines to explain, together with the Organisation, Management and Control Model, a set of measures and procedures suitable for reducing the risk of committing crimes within the company organisation.

2. The Code is also adopted in order to ensure that the ethical principles on the basis of which Tieng s.r.l. operates. are clearly highlighted as an essential foundation of corporate culture and behavior. They must therefore inspire the activities of all those who work for the Company, always keeping in mind the roles, functions and responsibilities entrusted to them for the achievement of the company's purposes.

Tieng, in accordance with national and international *best practices* in the field of business ethics, inspires the development of its business to principles of transparency and fairness, in compliance with ethical principles and values and the general canons of fairness and diligence.

This code, approved by the Board of Directors of Tieng, is accessible from the company website.

### **Art. 2 – Scope and Recipients**

1. This Code applies to all persons defined as "Recipients".

2. The following are considered "Recipients" and are therefore required to comply with the provisions of this Code of Ethics in the parts applicable to them:

- a. managers and employees;
- b. Administrators;
- c. all those who, directly or indirectly, permanently or temporarily, work for the Company (by way of example but not limited to, in particular external collaborators and consultants, customers and suppliers of goods and services).

## **Part II "Ethical principles of reference"**

### **Art. 3 – Legality and Responsibility**

1. In carrying out the corporate mission, the conduct of all recipients of this Code must be inspired by the ethics of responsibility. The Recipients, within their areas of competence, must know and comply with the laws and regulations applicable in the countries in which Tieng operates. Under no circumstances may the Company's interest be pursued or achieved in violation of the legislative provisions.
2. At the same time, the Company undertakes to constantly train and raise awareness among the Recipients regarding the provisions of the Code of Ethics and the sanctions deriving from it
3. Furthermore, the Company, in the belief that operating in a sustainable manner is a necessary option that can no longer be postponed, does its best to promote full transparency in relation to the impacts, results and sustainability performance (direct and indirect) deriving from its activities and to communicate them in a complete, non-misleading and truthful manner

### **Art. 4 – Principle of loyalty**

1. The Company has established a relationship of mutual trust and loyalty with each Recipient who works for it. Therefore, compliance with the rules of this Code of Ethics must be considered by the Recipients as an essential part of their obligations towards the Company.
2. In particular, with regard to the duty of loyalty, it is forbidden for employees to:
  - a. have employment relationships, consultancy assignments with third parties during the persistence of the contractual relationship, if these are in conflict of interest or incompatible with the activities carried out on behalf of Tieng, unless the Company has authorized them in writing
  - b. carry out activities that are incompatible with their official duties or in any case contrary to the interests of the Company;
  - c. disclose to third parties any information relating to company know-how, production processes, and the specificities of the processes carried out for customers. Terminated employees undertake in particular to maintain absolute confidentiality on what they have learned in the company and not to use it in any way and for any purpose.

### **Art. 5 – Value of the person**

1. The Company advocates the use of human resources that respects and enhances individual characteristics, protects diversity, and is based on dialogue and listening, with the aim of promoting development and professional growth.

2. All Recipients of this Code, in the pursuit of corporate purposes, must respect the dignity of people and their private sphere. Harassment and offenses of any kind are not tolerated. They must also maintain a climate of mutual respect within the company.

### **Art. 6 – Fairness, loyalty and collaboration**

1. Fairness, loyalty and cooperation are fundamental principles for Tieng

2. The Recipients of this Code must perform their activities in compliance with the indicated principles of conduct. The principle of fairness implies respect for the rights, including privacy and opportunities, of all those involved in work and professional activities. Tieng is therefore committed to acting in a fair and impartial manner, adopting the same behavior towards all the interlocutors with whom it comes into contact, albeit in the different forms of relationship and communication required by the nature and institutional role of the different interlocutors.

3. In internal and external relations, the Company requires the absence of harassing conduct aimed at:

- create a hostile work environment;
- unjustifiably interfere with the work of others;
- create obstacles/impediments to the professional growth of others.

### **Art. 7 – Impartiality and the principle of non-discrimination**

1. In its relations with its internal and external interlocutors, the Company undertakes to avoid any discrimination concerning:

- age, gender, sexual orientation, health status, disability, language, ethnicity and nationality;
- personal, political, philosophical or religious beliefs;
- any membership or withdrawal from a trade union association.

### **Art. 8 – Conflict of interest**

1. Conflict of interest means:

- a. any situation in which the pursuit of personal interest is contrary to the interest or business purposes;
- b. any situation in which each Recipient may take advantage or undue profit from known opportunities in the performance of his or her business activity.

2. The Recipients of this Code must always act avoiding situations or activities in which they are or may appear to be in conflict of interest.

3. In the event that a Recipient finds himself in a situation of conflict of interest, he must refrain from taking or participating in decisions/resolutions relating to the matter to which the conflict pertains, expressly declaring his or her situation.

**Art. 9 – Health and safety**

1. The Company commits to scrupulously comply with health and safety regulations and to apply them within the workplace.
2. To preserve the health, safety, and physical integrity of the Recipients, the Company is committed to consolidating and disseminating a culture of safety, developing greater risk awareness, and promoting responsible behavior.
3. Tieng ensures maximum collaboration from its collaborators and employees with the Head of the Prevention and Protection Service and anyone entitled to inspect and control the premises and related work systems.
4. In employment relationships, harassment must not occur in any form. Tieng is committed to preventing and prosecuting mobbing and personal harassment of all kinds, including sexual harassment. Each recipient is committed to avoiding such situations, including through the use of respectful language towards people and the work environment.

**Art. 10 – Environment and sustainable development**

1. Tieng, in compliance with the law, believes that the environment is a primary asset to be safeguarded and, to this end, plans its activities by seeking a balance between economic initiatives and essential environmental protection needs.
2. The Company is therefore committed to integrating, in the performance of its activities, evaluation factors and initiatives aimed at progressively reducing the environmental impact of the same, such as:
  - i. minimization of waste production, correct separation, recovery and recycling of the same, also through ad hoc information campaigns among collaborators and customers;
  - ii. identification of areas for improvement in environmental matters for the products it distributes and, where possible, choice of materials that are environmentally friendly in partnership with its suppliers;
  - iii. identification of channels and modes of freight transport aimed at the progressive reduction of environmental impact;
  - iv. implementation, compatibly with the available financial resources, of investments in its structures aimed at a continuous improvement of its environmental performance.
3. 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.

4. Tieng is committed to spreading the culture of respect for the environment among its employees and customers and to providing effective information on the methods of conduct in support of this commitment.

### **Art. 11 – Confidentiality of information**

1. Tieng, in compliance with the requirements on the protection of personal data provided for by European Regulation 2016/679 ("GDPR"), by Legislative Decree 30/06/2003 no. 196 ("Privacy Code") as amended and supplemented by Legislative Decree 101/2018, and subsequent amendments and additions, guarantees that the processing of personal data and confidential information, collected and stored by the Company, is aimed exclusively at carrying out the purposes relating to the exercise of its activity.
2. The recipients of this Code undertake to act in accordance with the Company's Data Security Policy and to protect the confidentiality of the personal data collected and processed.

### **Art. 12 – Protection of company assets**

1. In order to carry out its duties, each Recipient shall be entrusted with assets, physical and intangible, and resources, tangible or intangible, for which he or she is directly and personally responsible.
2. The Company's assets and resources (including IT resources), in fact, must always be used in accordance with the laws in force, this Code and the requirements of functionality and efficiency, as well as with diligence and responsible conduct and protection of the same, preventing third parties from misusing them.
3. It is prohibited, through information systems, to interfere with one's own productivity or that of others, or to access sites unrelated to work.
4. In order to protect intellectual and industrial property, Tieng also requires that each Recipient respect the confidentiality of the strategic choices adopted by the Company, and of *the Company's scientific, production and commercial know-how*.
5. In particular, all Recipients undertake to maintain the strictest confidentiality with regard to every aspect of the activity of Tieng and companies associated and/or connected to it, on the content of the documents and on all information of which they have become aware due to their relationship with the Company, including, but not limited to, information relating to employees, customers and products.

### **Art. 13 – Protection of the name and logo**

1. The Recipients of this Code of Ethics must not commit actions that may endanger or compromise the values, image and good name of the Company.
2. All Recipients are also required to avoid any use of the name and logo of Tieng in a manner that does not comply with the company's purposes and that may in any case prejudice the prestige and good name of the Company.

**Art. 14 – Gifts, gifts and benefits**

1. Tieng, in the pursuit of its corporate purposes, believes that the set of ethical principles and values expressed so far in this Code should inspire the activity of all those who work in the Company. Therefore, the Recipients may not in any way request, accept and/or offer gifts, gifts and benefits from/to third parties in order to obtain or grant an advantage for the Company and must inform the Company of relevant circumstances in which they have been the subject of such requests or offers.

2. The Company admits, however, the possibility of receiving or offering gifts, gifts or benefits of only a modest amount in accordance with current commercial customs, which are not capable of influencing the judgment and actions of employees and/or third parties.

**Art. 15 – Efficiency**

1. The principle of efficiency requires that in every work activity the economical management of the resources used in the performance of business processes is achieved and the commitment is made to offer products suitable for the needs of customers and according to the most advanced standards.

2. Tieng is committed to constantly guaranteeing the effectiveness and efficiency of business processes, through the preparation and compliance with programs for the continuous improvement of the quality of the products supplied through the adoption of technological and organizational solutions aimed at combining the satisfaction of the needs of its customers with the efficiency and cost-effectiveness of management. With this in mind, an integral part of the Code is the commitment to assess the compliance with European and national regulations in force both of the materials used for the production of the products marketed and of the finished products made available for sale, in order to ensure their quality and safety.

**Art. 16 – Spirit of service**

1. The principle of the spirit of service implies that each recipient of the Code must always be oriented, in his or her behaviour, towards collaboration and sharing the corporate mission.

**Art. 17 – Enhancement of human resources**

1. Human resources are a fundamental factor for the development of the company. Therefore, Tieng protects and promotes their professional growth in order to increase the wealth of skills possessed.

**Art. 18 – Internal control system**

1. In compliance with current legislation and with a view to planning and managing company activities aimed at efficiency, fairness, transparency and quality, Tieng adopts appropriate organisational and management measures to prevent unlawful conduct or conduct contrary to the rules of this Code by any person acting for the company.

In relation to the extension of the delegated powers, the Company implements Organisation, Management and Control Models that provide for suitable measures to ensure the performance

of activities in compliance with the law and the rules of conduct of this Code, to promptly detect and eliminate risk situations.

2. A special Supervisory Body shall be established to verify and apply the rules contained in this Code.

The Supervisory Body assists the Board of Directors in establishing and updating the guidelines of the internal control system, in assessing its adequacy and effective functioning and in analysing corporate risks and carries out the additional tasks subsequently indicated in this Code.

3. In order to prevent the risk of committing offences from which the Company may be liable pursuant to Legislative Decree 231/2001, the Organisational Models provide that all corporate activities attributable to the main processes and support processes are identified as activities in the context of which offences may be committed; the responsibilities relating to implementation and related control are defined and the Audit functions are assigned to the Supervisory Body, to which reports, any violations, and the results of checks are reported.

4. The Supervisory Body shall periodically verify the adequacy and effective functioning of the internal control system and carry out the measures deemed necessary and appropriate to ensure its best functioning.

This system makes use of a control activity carried out by the individual functions with respect to the procedures and activities within their competence and the activity of the Audit functions attributed to the Supervisory Body within the scope of their specific competences.

They have the task of assessing and contributing to the improvement of *risk management* and *governance processes*, verifying the internal control system in terms of the effectiveness and efficiency of operations, the protection of company assets, as well as compliance with laws, regulations and internal procedures.

### **Art. 19 – Relationship with Members**

1. Tieng, aware of the importance of the role played by the shareholder, undertakes to provide accurate, truthful and timely information and to guarantee the conditions of its participation, within the scope of its prerogatives, in corporate decisions.

2. It is the company's commitment to protect and increase the value of its business, in the face of the commitment made by the shareholder with its investments, through the enhancement of management, the pursuit of high standards in production uses and the solidity of the assets. The company is also committed to safeguarding and safeguarding the company's resources and assets.

3. In particular, the Company undertakes to ensure the regular participation of the directors in the work of the Shareholders' Meeting as well as to guarantee the orderly and functional conduct of the Shareholders' Meetings, in compliance with the fundamental principle of the shareholder to request clarifications on the various topics under discussion and to express his or her opinion.

4. The Recipients shall comply with the applicable regulations on the disclosure of information to the market and shall never take advantage of the inside information available.

**Part III "Rules of conduct"**

**Chapter I "Relations with employees and collaborators"**

**Art. 20 – Selection and management of employees and collaborators and the working environment**

1. The selection process of employees is carried out in compliance with equal opportunities, rejecting any form of nepotism, favoritism or clientelism.
2. The selection process is based exclusively on the correspondence of the professional and aptitude characteristics of the candidates to the job profile sought; People are recruited, taking into account their experience, aptitude and expertise.
3. The staff is hired with a regular employment contract, in compliance with current legislation and the National Collective Labour Agreements of the sector; no form of irregular work is allowed
4. At the time of establishment of the employment relationship, the new employee is provided with accurate information regarding:
  - a. functions and tasks to be performed;
  - b. regulatory and remuneration elements;
  - c. rules and procedures to be adopted in the performance of company activities.
5. The company is committed to protecting the moral and physical integrity of employees, collaborators and consultants. To this end, it promotes responsible and safe behaviour and adopts all the safety measures required by technological evolution to ensure a safe and healthy working environment, in full compliance with current legislation on prevention and protection.
6. In particular, for the management of aspects relating to health and safety in the workplace, the Company has adopted and implemented an Organisation and Management Model in accordance with art. 30 of Legislative Decree 81/2008, implementing a Health and Safety Management System in the workplace.
7. Tieng is committed to ensuring compliance with the necessary conditions for the existence of a collaborative work environment that is not hostile and free of any discriminatory behavior regarding race, religion, sex, political and trade union opinions, sexual inclinations, age, origin, disability or other factors, which have nothing to do with the work performance of the staff.
8. The company requires everyone's collaboration in order to maintain a climate of respect for the dignity, honor and reputation of everyone. To this end, it periodically carries out surveys on the corporate climate and works to constantly improve it. Harassment of any kind, including sexual harassment, is not allowed in work relationships.
9. Other behaviors prohibited as they would have a negative impact on the work environment are, but not limited to, the following:
  - a. Threats

- b. violent behavior
- c. introduction of weapons of any kind
- d. use of recorders, including video phones or cameras for purposes other than those approved by the function managers
- e. use, distribution, sale or possession of drugs or other narcotic substances, which are not to be taken for medical reasons.

In addition, the worker must not remain on Tieng's premises or in a working environment if he or she is under the influence of alcoholic beverages or drugs or other narcotic substances taken not for medical use.

- 10. Tieng does not tolerate any intimidation or discrimination and will take appropriate disciplinary measures against those who engage in such attitudes or abuse their position of authority within the company.
- 11. Employees who are aware of or suspect any of the violations provided for by the Whistleblowing legislation, pursuant to Legislative Decree no. 24 of 10 March 2023, are invited to report them in the manner described in Tieng's Whistleblowing Policy.
- 12. Tieng will take appropriate disciplinary measures against those who engage in intimidating or discriminatory attitudes or retaliatory conduct against anyone who provides information on violations or unlawful conduct pursuant to the aforementioned Whistleblowing Policy.

### **Art. 21 – Training and evaluation of employees**

- 1. Tieng provides all employees with information and training plans in order to enhance the specific skills and implement the professional value of employees.
- 2. The Company plans training based on specific professional development needs, i.e. taking into account the career path, specific business needs and legal requirements.
- 3. The Managers of each company area periodically evaluate the performance of their subordinates and, if they identify any areas for improvement, adopt appropriate intervention measures.

### **Art. 22 – Obligations and duties of employees**

- 1. Each employee must act correctly, loyally and integrally in the performance of company activities, respecting the obligations stipulated in their employment contract and those deriving from current regulations and this Code of Ethics.

He must also base his conduct on mutual respect and collaboration.

- 2. Employees must avoid any situation of conflict of interest.

The Company requires its directors to avoid any situation of conflict of interest and to declare any interest that, on their own behalf or on behalf of third parties, they have in a given transaction of the Company; more specifically, they must comply with the relevant legislation on conflict of interest.

All representatives of the Company, more generally, must ensure that corporate decisions are always adequate and suitable to safeguard the interests of the Company itself and must provide adequate information in the event that there is a simultaneous personal interest of theirs.

**3.** The Company requires employees to maintain the utmost confidentiality on the company information of which they become aware, as well as on the information, of any nature or form, collected or processed in the performance of their work activities even after the termination of the employment relationship; they are also required not to disclose it without authorization, unless required by law.

To this end, employees:

- a. they must exercise due caution in the use of information acquired during their activity;
- b. they must not use the information obtained either for personal advantage, or in a manner contrary to the law or that is or may be detrimental to the purposes and values of the Company.

**4.** Anyone involved in a Report or in the investigation of an alleged violation pursuant to the Whistleblowing legislation is required to maintain the utmost confidentiality on the identity of the Whistleblower, the persons involved and the contents of the report, except for the exceptions provided for by law, as prescribed by Tieng's Whistleblowing Policy.

**5.** The Heads of the company areas or, in any case, all those who have management functions and/or responsibility towards employees are explicitly prohibited from abusing their hierarchical position. In particular, by way of example:

- they must not offer preferential treatment or create situations of privilege;
- they must not obtain advantages for themselves or for others, abusing their decision-making and management power;
- they must reject undue pressure.

## **Chapter II "Relations with the Public Administration"**

### **Art. 23 – Legality and impartiality**

**1.** In relations with the Public Administration, all activities and negotiations conducted by the Company's employees or external collaborators/consultants, competent according to the Company's internal rules, are based on the utmost respect for honesty, transparency, clarity, fairness, good faith and legality, so as to protect the company's reputation and image.

**2.** Employees and collaborators who dialogue with the Public Administration, in the performance of their duties, must in no way prejudice the impartiality of judgment of the latter's representatives. Therefore, by way of example:

- a. in the event of a conflict of interest, the employee/collaborator must refrain from dealing with the Public Administration or with one of its representatives, declaring any situation of conflict, even if only apparent or potential;
- b. it is forbidden to mislead or alter the analytical and decision-making skills of the representatives of the Public Administration through the production of corporate documents that do not represent facts that correspond to the truth.

### **Art. 24 – Business negotiations**

**1.** If the Company's employees or collaborators follow any business negotiations, tenders or institutional relations with the Public Administration or its representatives, they must operate in compliance with the law and fair commercial practice, avoiding improperly influencing the decisions of the counterparty and those of the officials.

**2.** By way of example and not limited to, the following conducts are prohibited where they are aimed at obtaining an undue advantage for the Company or harming the public interest or the integrity of the public administration or the Company:

- a. obtain or solicit the obtaining of confidential information that may damage the integrity or reputation of Tieng or the Public Administration in order to win a tender for a contract;
- b. to benefit the representatives of the Public Administration in a personal capacity, offering them employment and/or commercial opportunities for the same purpose;
- c. induce representatives of the Public Administration to do or omit activities that violate the laws in force in the legal system in the handling of a given business to the advantage of the Company;
- d. refuse to provide or alter information that the Public Administration has requested in the performance of its inspection function.

**Art. 25 – Contributions, subsidies and permits**

1. The Company prohibits the obtaining, from the Public Administration or other Public Body, any type of financing, contribution, permit or authorization to carry out activities, using modified documents and/or declarations or statements that do not correspond to the truth, or by means of omitted information or through artifices or deceptions, which may mislead the Provider/Issuer of the authorization.

2. In addition, it is forbidden to divert or allocate a loan, a grant or a contribution, obtained from the Public Administration or from another Public Body, to other purposes other than those for which they were given.

**Art. 26 – Gifts, gifts, sponsorships**

1. The Company condemns any conduct, carried out by the Recipients of this Code, which consists in promising or offering, directly or indirectly, money or other benefits to representatives of the Public Administration or to their relatives and relatives, in order to obtain, even if only potentially, an interest or advantage for the Company.

## **Chapter III "Relations with suppliers"**

### **Art. 27 – Choice of supplier**

1. The selection of suppliers shall be made solely taking into account the ability to provide and guarantee products and services of an adequate standard, as well as the criteria of competitiveness, quality, cost-effectiveness and price, .

No discriminatory practice is put in place during the choice of the contractor.

2. In particular, the Company undertakes to prepare the procedures necessary to ensure maximum transparency and efficiency in the supplier selection process.

### **Art. 28 – Transparency, equality, loyalty, diligence in the execution of contracts and free competition**

1. Relations with suppliers are based on the principles of transparency, equality, loyalty and free competition. Therefore, employees, in the exercise of activities aimed at maintaining supply relationships, must:

- a. comply with current regulations and contractual conditions;
- b. comply with the Company's internal procedures relating to the management of relations with suppliers;
- c. ensure the satisfaction of the requirements of quality, safety and delivery times of goods, collaborate with the supplier;
- d. have a transparent and complete correspondence with suppliers;
- e. not be subject to any form of conditioning by suppliers, during the making of decisions or the execution of acts related to their work activity.

2. The company and the supplier must work in order to build a collaborative relationship of mutual trust. Tieng undertakes to inform the supplier in a correct and timely manner about the characteristics of the activity, the forms and times of payment in compliance with the regulations in force and the expectations of the counterparty, considering the circumstances, the negotiations carried out, the overall content of the contract stipulated.

3. The fulfilment of the contractual services by the supplier must comply with the principles of equity, fairness, diligence and good faith and must be carried out in compliance with current legislation.

4. The company requires its suppliers to be informed in advance of the possible involvement of subcontractors/subcontractors in the production of products and/or components intended for it. The use of subcontractors/subcontractors is subject to their adherence to the principles of this Code.

**Art. 29 – Knowledge of and compliance with the Code of Ethics**

1. The content of this Code of Ethics is brought to the attention of suppliers by the Company, in the contractual documentation and through its publication on the company website.

2. By signing the declaration referred to in the first paragraph, suppliers undertake not to engage in any conduct likely to induce Tieng and its employees/collaborators to violate the principles set out in this Code.

3. Tieng expects each supplier with whom it has a business relationship to share the commitments and values expressed in the Code. The performance of conduct contrary to the principles expressed herein is considered by the Company to be a serious breach of the duties of fairness and good faith and a reason for damage to the relationship of trust.

In particular, Tieng expects all its suppliers:

- act in full compliance with applicable local, national and international laws and regulations in the performance of their business activities;
- acquire all authorizations, licenses and registrations required under applicable law;
- protect the environment and minimize the impact of business activities on natural resources and ecosystems;
- act with integrity and honesty in all business relationships;
- make available, at Tieng's reasonable request, adequate documentation demonstrating compliance with applicable legal requirements and implementation of the principles outlined in this Code.

**Art. 30 – Fairness, good faith and loyalty**

1. The Company requires that collaborators and consultants, in any capacity, behave with fairness, loyalty, and good faith in the execution of their contractual relationship with the Company.

**Art. 31 – Knowledge of and observance of the Code of Ethics**

1. The Company shall ensure that this Code is disseminated to external collaborators and consultants; at the same time, the latter are obliged to comply with its provisions for the parts of their competence.

2. Knowledge of the principles of the Code of Ethics is attested in the contractual documentation with external collaborators and consultants and through its publication on the company website.

3. By signing the declaration referred to in the second paragraph, external collaborators and consultants undertake not to engage in any conduct likely to induce the Company and its employees to violate the principles set out in this Code.

4. The performance of conduct contrary to the principles expressed in the Code of Ethics is considered by the Company to be a serious breach of the duties of fairness and good faith and a reason for damage to the relationship of trust. Consequently, in the event that these behaviors occur, Tieng may decide to terminate the contractual relationship for just cause.

## **Chapter V "Customer relations"**

### **Art. 32 – Transparency and fairness**

1. The Company bases its relations with customers on utmost transparency and fairness, always managing them in compliance with current regulations.

2. To enable customers to make informed and rational choices, the Company provides clear and truthful information about the products it offers. In particular, in relations with customers, the Recipients must:

- comply with applicable regulatory provisions;
- observe the internal procedures for managing customer relations;
- refrain from disparaging evaluations of competing products;
- facilitate the customer's training in informed choices regarding products, offering him adequate information.

3. The Company commits to satisfying its Customers by fulfilling the obligations set out in the relevant contract. The Company also commits to not engaging in discriminatory conduct against its Customers that limits the freedom of private economic initiative or contractual autonomy. Tieng establishes a relationship with customers characterized by high professionalism and based on availability, respect, courtesy, research and the offer of maximum collaboration.

4. Customer satisfaction is a fundamental objective for Tieng. To this end, the Company is committed to guaranteeing the quality of the products supplied. Tieng undertakes to adopt a style of behavior towards Customers based on efficiency, collaboration and courtesy, providing, in a clear and transparent manner, accurate, complete and truthful information about the characteristics of the products offered, using simple and understandable language and ensuring equal treatment of all Customers.

### **Art. 33 – Contracts and communications**

1. Contracts and communications with Customers must be:

- a. clear and simple, formulated in the language closest possible to that of the widespread clientele;
- b. compliant with current regulations.

2. The company undertakes to communicate promptly and in the most appropriate way any information relating to any changes and variations in the performance of the product offered.

### **Art. 34 – Customer satisfaction**

1. The company undertakes to facilitate interaction with customers through the management and rapid resolution of any complaints and/or using appropriate communication systems.

2. Tieng repudiates litigation as a tool aimed at obtaining undue advantages and has recourse to it on its own initiative only when its legitimate claims do not find due satisfaction in the interlocutor.
3. The company, in order to systematically listen to the Customer, prepares periodic Customer Satisfaction surveys, as a source of information to identify and verify the objectives of improving the product level.
4. The Company protects the privacy of its Customers in accordance with applicable regulations, committing not to communicate or disseminate related personal, economic, and consumer data, except as required by law.

### **Art. 35 – Quality of products**

1. In order to ensure maximum customer satisfaction, the Company is committed to achieving and maintaining high quality standards in the products offered.
2. The Company provides adequate control mechanisms to ensure maximum compliance with regulations on product safety and quality.
3. The Company ensures control mechanisms to avoid delivering a product different from the one declared or agreed upon, with regard to nature, origin, provenance, quality, and quantity.

**Part IV "Effectiveness of the Code of Ethics"**

**Art. 36 – Dissemination of the Code of Ethics**

1. Tieng undertakes to disseminate this Code and any updates thereto to the Recipients in the manner deemed most appropriate from time to time. In particular, for example:
  - a. publication on the company website and intranet;
  - b. posting on company bulletin boards, pursuant to art. 7, paragraph 1 of Law no. 300/1970;
  - c. communication to the Company's employees or external collaborators/consultants, providing, if appropriate, for the signing of a declaration, certifying the receipt, acknowledgement and acceptance of the Code by the Recipient;
  - d. information to occasional external collaborators/consultants relating to the existence and contents of the Code;
  - e. inclusion in all contracts entered into of a clause informing third parties of the existence of this Code of Ethics, so that the latter can accept it and undertake, as far as applicable to them, to comply with the principles and rules of conduct contained therein;
  - f. preparation of specific and differentiated training/information plans according to the corporate role played by the Recipient, which disseminates the principles and rules of conduct on which the Company's activity is based.

**Art. 37 – Effectiveness of the Code of Ethics and sanctions**

1. The Company considers compliance with the provisions of this Code to be an integral and essential part of the obligations incumbent on the Recipients. Violation of the rules of conduct or procedure of the Code of Ethics constitutes a breach of the aforementioned obligations, has disciplinary significance and may give rise to disciplinary proceedings against those responsible.
2. Recipients who make complaints containing false and/or unfounded information and made with retaliatory, vexatious and/or malicious purposes or made in order to damage the image of the alleged author of the reported act, may also be subject to disciplinary proceedings.
3. In the aforementioned cases, disciplinary sanctions may be imposed, proportionate to the violations of the Code and in accordance with the provisions of the applicable CCNL.
4. Conduct carried out by external collaborators, consultants, customers, suppliers and other external parties in contrast with the rules and principles of this Code and which has entailed or may entail, in the opinion of the competent corporate functions and after consulting the Supervisory Body, prejudice to the Company may result in the termination of the contract and the request for compensation for any damage caused to the Company.

## Part V "Implementation and control procedures"

### Art. 38 – Establishment of the Supervisory Body

1. Tieng has set up an internal Supervisory Body, with the task of supervising the implementation and compliance with this Code of Ethics and the Organisation, Management and Control Model, pursuant to Legislative Decree 231/2001, implemented in accordance with the Code itself. In particular, the Supervisory Body:

- a. is responsible for expressing binding opinions regarding ethical issues that may arise in the context of corporate decisions and alleged violations of the Code of Ethics reported to it by the Data Processors;
- b. it must follow the periodic review of the Code of Ethics and its implementation mechanisms, including through the submission of proposals for adaptation;
- c. has the task of setting up and approving the communication and ethics training plan.

2. The Supervisory Body is a body with independence, full autonomy of action and control, whose activity is characterised by professionalism and impartiality, to which this office is assigned through a specific deliberative act of the Board of Directors.

3. The members of the Supervisory Board remain in office in accordance with the provisions of the deed of appointment of the Board of Directors and may be dismissed by the Board only for just cause.

### Art. 39 – Audit Functions

1. The Audit functions on the effective implementation and updating of Model 231 are assigned to the Supervisory Body. This Body prepares the SB's audit plan and may delegate its execution to external professionals or company managers/experts. The Area Company Managers who receive any reports from the reference structure of any violations of the Code of Ethics, report them to the Supervisory Body. The Supervisory Body has free access to data, documentation and information useful for carrying out its activities.

The Area Company Managers are required to collaborate effectively in the performance of the activities indicated above.

### Art. 40 – Whistleblowing

1. The Company, in its effort to combat illegal activities and constantly improve the corporate culture characterized by correct behavior, has adopted the Whistleblowing Policy which describes the methods for reporting violations and/or offenses (so-called "Whistleblowing"). *Whistleblowing*) in accordance with current legislation and strives to allow whistleblowers in good faith ample protection and confidentiality.

2. The Company therefore:

- it has implemented internal channels for reporting violations and/or wrongdoing;

- has entrusted the management of reports to an autonomous, dedicated, specifically trained and equipped with the necessary skills to follow up on the reports received;
- maintains the strictest confidentiality on the reports received;
- prohibits any form of retaliation or discrimination against whistleblowers;
- guarantees the protection of whistleblowers from any act of retaliation or discrimination they may face for having made the report and keeps their identity confidential, without prejudice to legal obligations;
- it also protects facilitators, persons linked to the Whistleblower by a stable emotional or kinship bond within the fourth degree, who work in the same work context, and the Whistleblower's work colleagues; the Entities owned by the Whistleblower or operating in the same working context as him/her; the anonymous Whistleblower, if subsequently identified and subject to retaliation.
- applies appropriate sanctions against those who violate the whistleblower's protection measures, and those who also violate the obligation of confidentiality relating to the person involved and/or mentioned in the report.
- applies disciplinary and/or sanctioning measures, or judicial initiatives in the event of reports that prove to be unfounded or opportunistic, whether they come from internal or external channels. The Whistleblower who has made the Report in good faith may not be sanctioned.

### **Art. 41 – Disciplinary system**

**1.** The violation of the rules of the Code of Ethics by its Recipients damages the relationship of trust established with the company and may result in the imposition of disciplinary sanctions, graduated with the "seriousness of the violation"; without prejudice to any request for compensation for damages.

**2.** With respect to employees, compliance with the rules of the Code of Ethics is an essential part of the contractual obligations pursuant to and for the purposes of articles 2104, 2105 and 2106 of the Civil Code and the CCNL of the category and individual contracts.

**3.** The sanctioning system complies with the provisions of Law no. 300 of 20 May 1970, the specific sector regulations, collective bargaining and current company provisions.

The recipients of sanctions can be:

- a. Members of the Board of Directors;
- b. employees (managers, middle managers, office workers, workers);
- c. third party recipients (external collaborators, consultants, partners, suppliers...);
- d. SB members.

Disciplinary offences are collected (directly or indirectly) by the SB, which, after the appropriate investigations to verify the infringements, may propose the application of the sanctions provided

## **TIENG S.r.l.**

for by the Model to the body in charge which is responsible for the final decision on the sanction to be applied.

**Part VI "Final provisions"**

**Art. 42 - Adoption of the Code of Ethics**

1. The adoption of this Code was approved by the Board of Directors on 4 March 2025.
2. Any subsequent amendment or addition to this Code must be approved by the Board of Directors.