

University of Nottingham Italy Scarl

CODE OF ETHICS

INDEX

1	Introduction	4
1.1	Code of Ethics - Anti-Corruption Section	5
2	Principles of behavior Centrality of the person	5
2.1	Ethics and responsibility	5
2.2	Innovation	6
2.3	Listening and comparison	6
2.4	Fairness and transparency	6
2.5	Business development	6
2.6	Customer satisfaction	7
2.7	Full compliance with the law and of the Regulations	7
2.8	Confidentiality	7
2.9	Health protection and safety in the workplace	8
2.10	Environmental protection	8
2.11	Documentation of activities	8
2.12	Efficiency	8
2.13	Spirit of service	9
2.14	Competition	9
2.15	Prevention of corruption	9
2.15.1	General principles	9
2.15.2	Gifts received	9
2.15.3	Gifts made	10
2.15.4	Donations and sponsorships, contributions	10
2.15.5	Business lunches and dinners	10
2.15.6	Prevention of money laundering	10
2.15.7	Protection of fair competition	11
2.15.8	Conflict of interest	11
3	Society governance system	11
4	Internal control system	12
4.1	Operating procedures and decision-making protocols	12
5	Areas of application	13
5.1	Relations with customers / members	13
5.1.1	Equality and impartiality	13
5.1.2	Transparency	13
5.1.3	Quality and customer satisfaction	13
5.1.4	Interaction with customers/members	13
5.2	Relations with staff	13
5.2.1	Human resources management	13
5.2.2	Safety and health	14
5.2.3	Protection of the person	15
5.2.4	Personnel selection	15
5.2.5	Recruitment	15
5.2.6	Staff duties	15
5.2.7	Additional obligations for heads of corporate functions	16
5.2.8	Use of company time and assets	16
5.2.9	Conflict of interest	17

5.2.10 Use of computer systems	17
5.2.11 Obligations of employees	17
5.3 Relations with contractual partners	17
5.4 Relations with public institutions and other external subjects	17
5.4.1 Public Administrations	17
5.4.2 Social initiatives, protection of the environment and cultural heritage	18
5.4.3 Trade unions, associations and political parties	18
5.4.4 Employment relationships with former employees of the Public Administration	18
5.5 Participation in tenders and relations with clients	19
5.5.1 Participation in competitive comparison procedures	19
5.5.2 Fairness in business negotiations	19
5.6 Relations with suppliers	19
5.6.1 Choice of supplier	19
5.6.2 Transparency	19
5.6.3 Fairness and diligence in the execution of contracts	20
5.7 Relations with the press and external communications	20
6 Implementing rules	20
6.1 Adoption and dissemination	20
6.2 Information requirements	20
6.3 Contractual value of the Code of Ethics	21
6.4 Reporting problems or suspected violations	21
6.5 Disciplinary measures resulting from violations	21

1. Introduction

The University of Nottingham Italy Scarl (hereinafter UNIT Scarl or Company), according to its Statute, promotes, on a non-profit basis, research and development and higher education mainly but not exclusively in the aeronautical, space and ecologically sustainable development of the air transport system; to be realised also through participation in regional, national, European and international research programs, in adherence to the scientific, technological and economic evolution of the same sectors.

In this context, the Company also refers to its statutory principles, its regulations and other acts adopted.

The Company, as part of its institutional activity, in addition to respecting, in carrying out its activities, the laws and regulations in force, also intends to observe ethical principles in the daily conduct of its work: these principles are collected in this Code of Ethics (hereinafter "Code") which represents an official document of the Company in which the general principles and rules of conduct are identified to which positive ethical value is recognised.

However, the Company believes that the decisions and behaviors of its "personnel" must be based on ethical rules, even in cases where they should not be codified by specific regulations.

The term personnel refers to all the people who work for the Company, or carry out activities for it: employees, directors and collaborators in different capacities (for example continuous or occasional collaborators, professionals, volunteers and the like).

The Code expresses the commitments also of an ethical nature undertaken by those who, for various reasons, come into contact with the Company's activities, such as suppliers, partners and other subjects.

Particular attention is required to the "managerial" class (administrators in the first place), as well as to the managers (according to the different hierarchies), who all have the task of supervising the functioning of the Code and taking care of its updating.

The Code is made available to suppliers and other third parties who interact with the Company: in particular, it is brought to the attention (possibly also with computer systems or via the website) of third parties, who receive assignments from the Company, or who have lasting relationships with it, inviting them to comply with the principles and criteria of conduct, in the context of the relations they have with the Company itself. And this also with a possible declaration of responsibility of the same.

The Company conforms its internal and external activities to compliance with the principles contained in this Code, in the belief that ethics is a value to be constantly pursued in the performance of its business and that of the subjects who work on its behalf.

The Code is a document desired and approved by the highest management of the Company. The Code aims to base the operations, conduct and way of acting of the recipients on correctness, fairness, integrity, loyalty and professional rigor, both in relations within the Company and in relations with external parties.

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

The Code is a *corpus* of fundamental principles that inspire company activities, guiding the behavior of employees, collaborators and Directors (hereinafter referred to as "Subjects").

In particular, by way of example:

- UNIT Scarl also takes into account the principles and values of the Code of Ethics when

- setting business objectives;
- employees and collaborators adapt their actions and behaviour to the principles, values, objectives and commitments set out in the Code of Ethics.

The Code of Ethics consists of:

- the general ethical principles that identify the reference values in the company's activities;
- the criteria of conduct towards each stakeholder, which provide the guidelines and rules to which the recipients of the Code are required to comply;
- the implementation mechanisms that outline the control system for the correct application of the Code of Conduct and for its continuous improvement.

1.1 Code of Ethics - Anti-Corruption Section

With the adoption of the Code of Ethics, UNIT Scarl has the following objectives:

- Provide guidelines and ethical criteria of conduct to the recipients to be followed for the proper conduct of their activities;
- Contribute to maintaining a culture of integrity, honesty, fairness and responsibility within the Company, rejecting corruption and any illegal practices.

Precisely with reference to the anti-corruption purpose, the Company has deemed it necessary to implement this Code to make it an even more effective tool in the fight against corruption phenomena decisively opposed by international and domestic legislation, also in light of Law no. 190 of 6 November 2012 on "Provision for the prevention and repression of corruption and illegality in the Public Administration".

The Italian legislator, in fact, implementing a comprehensive reform of the anti-corruption system, conforming to supranational provisions, has provided, alongside the introduction of stricter behavioral rules aimed at reorganizing the discipline of administrative transparency, a more afflictive sanctioning system whose effects fall on both individuals and bodies.

The Code of Ethics is therefore a tool for implementing the company policy, expressing the Company's precise desire to reject corruption and any illegal practice, in full compliance with current legislation and applicable regulations.

2 Principles of behavior Centrality of the person

The Company believes in people as an essential element in creating value and improving internal processes. It promotes the development of professionalism and skills as a fundamental condition for common growth, encouraging initiative, teamwork and the ability to delegate.

2.1 Ethics and responsibility

The Company adopts ethically correct rules and behaviors in full respect of people and the environment and operates with a strong awareness of responsibilities from an economic, social, environmental and safety point of view.

In carrying out the Company's mission, the conduct of all recipients of this Code must be inspired by the ethics of responsibility.

The recipients of the Code are required to comply with current legislation; under no circumstances is it permissible to pursue or achieve the Company's interest in violation of the law.

Each employee and/or collaborator must act loyally and in good faith, respecting the obligations contractually signed and ensuring the requested services. It must also know and observe the content of this Code of Ethics, basing its conduct on respect, cooperation and mutual collaboration.

The principle of ethical correctness implies respect for the rights and laws in force aimed at protecting the individual personality of all subjects who are involved in their work and professional activity.

This also requires the elimination of any discrimination and any possible conflict of interest between employees and the Company.

In fact, in carrying out any activity, the Company operates to avoid incurring situations of conflict of interest, real or even potential. Among the hypotheses of "conflict of interest", in addition to those defined by law, we also mean the case in which a Subject operates for the satisfaction of an interest other than that of the Company to derive an advantage for himself or third parties.

2.2 Innovation

The Company pursues research and technological and organisational innovation in the belief that the adoption of these solutions allows us to operate with greater efficiency.

2.3 Listening and comparison

The Company promotes listening and constant dialogue with all our stakeholders as a stimulus to solve problems, create new ideas and constant improvement.

2.4 Fairness and transparency

The Company's conduct is characterized by fairness and transparency and we are committed not to implement any discrimination and to offer equal opportunities for treatment to our interlocutors.

The principle of equity implies that in relations with all counterparts, the Company avoids any discrimination based on age, racial and ethnic origin, nationality, political opinions, religious beliefs, sex, sexuality or the state of health of its interlocutors.

The principle of transparency is based on the truthfulness, accuracy and completeness of information both outside and inside the Company.

The system of verification and resolution of complaints implemented against customers must allow information to be provided through communication, both verbal and written, constant and timely.

In the formulation of contracts, the Company elaborates the clauses in a clear and comprehensible way, always ensuring the maintenance of the condition of equality with the contractor.

2.5 Business development

The Company intends to create value for the business system, increasing its financial solidity and economic.

2.6 Customer satisfaction

The Company places customers / members at the center of our attention with the orientation to meet their needs and expectations in terms of quality and safety of the service provided and assistance in solving problems.

2.7 Full compliance with laws and regulations

The Company has as its essential principle the full observance of laws and regulations in force in Italy and in all the countries in which it operates and respect for the democratic order constituting therein.

Each employee must, therefore, undertake to comply with the regulations applicable to the

company's activity. Under no circumstances is it permissible to pursue or achieve the Company's interest in violation of the law.

This commitment must also apply to directors, managers, consultants, suppliers, shareholders and anyone who has relations with UNIT Scarl.

The latter will not initiate or continue any relationship with those who do not intend to align themselves with this principle.

The Subjects, therefore, must be aware of the laws and behaviors legally due; If doubts arise or need further clarification, it is obligatory to consult one's immediate superiors in this regard.

Furthermore, it being understood that the Company must ensure an adequate training and continuous awareness program on issues relating to the Code, the latter is made known to all personnel, even with direct delivery, except for forms of advertising required by law for particular purposes (for example Article 7 of Law 300/70).

2.8 Confidentiality

The Company guarantees, in accordance with the provisions of the law, the confidentiality of the information in its possession pursuant to EU Regulation 679/2016 and subsequent amendments. Employees and collaborators of the Company are prohibited from using confidential information for purposes not related to the exercise of their professional activity.

In particular, the information, data, knowledge acquired, processed and managed by the Subjects in the exercise of their activity must remain strictly confidential and appropriately protected and may not be used, communicated or disclosed, both inside and outside the Company, except in compliance with current legislation and company procedures. Confidential information can be:

- a) business, strategic, economic/financial, accounting, commercial, managerial and operational plans;
- b) projects and investments;
- c) data relating to personnel, customers, suppliers, users and in general all data defined as personal and particular defined by EU Regulation 679/2016 with particular attention to those that the law itself defines as sensitive;
- d) the company's performance and productivity parameters;
- e) commercial contracts, business documents;
- f) *know-how* related to the performance of services;
- g) databases relating to suppliers, customers, employees, brokers and external collaborators;
- h) the resolutions of UNIT Scarl.

The Subjects, in processing such data and information, must pay the utmost care and confidentiality. In particular, employees must:

- a) keep confidential the news and information learned in the exercise of its functions and that are not subject to transparency in accordance with the law and regulations;
- b) observe the duty of confidentiality even after termination of service;
- c) consult only the documents to which they are authorised to access, using them in accordance with their duties and allowing access only to those who are entitled to them and in accordance with the instructions given;
- d) prevent the possible dispersion of data by observing the security measures given, keeping the entrusted documents with order and care and avoiding making unnecessary copies.

2.9 Health protection and safety at work

The safety of workers is a fundamental principle that inspires the choices and decisions of the Company and that is pursued with firmness and absolute rigor.

Employees and collaborators, whose physical and moral integrity is considered a primary value of UNIT Scarl, are guaranteed working conditions that respect individual dignity, in safe and healthy work environments.

2.10 Environmental protection

UNIT Scarl. is committed to protecting the environment as a primary asset. To this end, it directs its choices, so as to ensure compatibility between the pursuit of its institutional goals and environmental needs. Consequently, the Company rejects conduct that deviates from the aforementioned principles.

For this reason, the Company in carrying out its activities undertakes to safeguard the surrounding environment and to contribute to the sustainable development of the territory. In this context, UNIT Scarl undertakes to operate in every situation in full compliance with the regulations governing the matter and to limit the environmental impact of its activities.

2.11 Documentation of activities

All activities, actions, transactions and operations of the Company must be:

- a) carried out in compliance with current regulations, the utmost management correctness, the completeness and transparency of information and both formal and substantive legitimacy;
- b) carried out in compliance with the instructions and procedures and within the limits of the proxies received and the budgets approved by UNIT Scarl, as well as being legitimate, consistent and congruous.

Persons who become aware of any omissions, alterations or falsifications of accounting records, or of the related supporting documents, are required to promptly inform their superior, or the head of the competent company function, who will act in the manner described in the Code of Ethics.

2.12 Efficiency

The principle of efficiency requires that in every work activity the cost-effectiveness of the management of the resources used in the provision of services is realised and the commitment is made to offer an adequate service with respect to the needs of the customer / partner and according to the most advanced standards.

2.13 Spirit of service

The principle of the spirit of service implies that each recipient of the Code is always oriented, in his behavior, to sharing the corporate mission aimed at providing a service of high social value and utility to the community, which must benefit from the best quality standards.

2.14 Competition

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

2.15 Prevention of corruption

2.15.1 General principles

The recipients of this Code, in line with corporate provisions and in compliance with anti-

corruption legislation, must not offer or promise, both to public and private entities, gifts, gifts or other benefits, except those of modest value made occasionally in the context of normal courtesy relations (eg on the occasion of official holidays) or normal commercial practices.

It is absolutely forbidden to accept, request or solicit for oneself or for others, recommendations, preferential treatment, gifts or other benefits from the subjects with whom one enters into a relationship, exceeding normal commercial practices or courtesy, which may prejudice the impartiality of judgment. For the purposes of this article, gifts or other benefits of modest value are those with a value not exceeding € 150. The employee does not accept from parties external to the Company compensation in any form for services to which he is required for the performance of his office duties and, in the stipulation of contracts on behalf of the Company, does not resort to mediation, nor does he correspond or promise any utility, by way of intermediation, to facilitate (or for having ordinarily provided) the conclusion or execution of the contract even if this activity is carried out for the benefit of the Society.

Any gifts made, economic advantages or other benefits must generally have the following characteristics:

- not consist of a cash payment;
- be carried out in relation to commercial relations or other legitimate business activities and in good faith;
- be reasonable according to the circumstances;
- comply with generally accepted standards of professional courtesy.

2.15.2 Gifts received

Anyone who receives from third parties gifts or hospitality treatments or economic advantages or other benefits that cannot be considered as acts of courtesy of modest value or that are in any case higher than the limits indicated above of 150 euros, has the obligation to return them spontaneously to the sender, informing him of the Company's company policy and to notify the direct superior. If the return is not possible, or in doubtful cases, the recipient is obliged to donate it to charity. Gifts with a value of less than 150 euros that undoubtedly meet the ethical requirements including those of "Legality", "Fairness" and "Transparency", can be retained by the recipient.

2.15.3 Gifts made

The gifts made and the benefits of any kind (donations, sponsorships, hospitality, etc.) must be duly authorized and must be adequately documented.

In particular, gifts with a value exceeding 150 euros must be previously authorized by UNIT Scarl

2.15.4 Donations and sponsorships, contributions

In the case of donations and sponsorships to organisations operating in the social or non-profit field, in the choice of proposals to join, particular attention will be paid to any possible conflict of interest of a personal or corporate nature.

UNIT Scarl does not allow sponsorship activities that are not justified by corresponding and proportionate reasons of promotion of the company's image and development of commercial relations.

All donations and contributions to bodies, administrative bodies and charitable organisations must be expressly authorized, in compliance with the adopted internal regulations, with an act that shows the legitimacy of the contribution or donation and the adherence of the contribution or donation with the approved budget, the recipient, the purpose, as well as the payment

methods that must find truthful and transparent registration in the accounting documents of the society.

2.15.5 Business lunches and dinners

The employee, authorized as per company regulations, can offer invitations to business lunches / dinners or attend social events in order to develop good business relations and promote the image of the Company provided that these activities take place within acceptable limits and are recognised as company practice.

Reimbursement of expenses will not be accepted for amounts relating to lunches and / or dinners exceeding the amount provided for in the relative budget.

In any case, the employee must refuse or not offer invitations of this type when he considers that they may affect his independence and impartiality in the choices he has to make in the performance of his duties.

2.15.6 Prevention of money laundering

UNIT Scarl carries out its activities in full compliance with current anti-money laundering regulations and the provisions issued by the competent authorities. The Company's principle is that of maximum transparency in commercial transactions and prepares the most appropriate tools in order to combat the phenomena of receiving stolen goods, money laundering and use of money, goods or benefits of illicit origin.

Staff must never engage in or be involved in activities involving money laundering (i.e. acceptance or processing) of proceeds from criminal activities in any form or manner.

Directors, employees and collaborators must verify in advance the available information (including financial information) on commercial counterparties, consultants and suppliers, in order to ascertain their moral integrity, their respectability and the legitimacy of their activity before establishing business relationships with these activities; They are required to strictly observe the laws and company procedures in any economic transaction involving them, ensuring full traceability of incoming and outgoing financial flows and full compliance with anti-money laundering laws where applicable.

2.15.7 Protection of fair competition

UNIT Scarl intends to protect the value of fair competition by refraining from collusive and predatory behavior. The Company and its collaborators must comply with the principles and rules of free competition and must not violate the laws in force on competition, antitrust and protection of its customers.

It is therefore forbidden to engage in any conduct which violates the habitual and free exercise of commerce and industry and which, as such, damages commercial confidence and good faith in trade.

As part of fair competition and customer protection, the Company and its collaborators undertake not to violate third party rights relating to intellectual property and to comply with the rules protecting the distinctive signs of intellectual works or industrial products (trademarks, patents) by putting in place controls on full compliance with the legislation protecting industrial property rights.

It is forbidden to market products that present the use of signs, figures or indications bearing false indications sufficient to mislead as to the actual origin, provenance or quality of the work or product.

2.15.8 Conflict of interest

In the conduct of any activity of the Company, situations where the subjects involved are in a position of conflict of interest must always be avoided. A conflict of interest is deemed to exist both in the event that a recipient pursues an objective other than that pursued by the Company or voluntarily procures a personal advantage in the performance of activities carried out in the interest of the Company, and in the case in which the representatives of consumers, contractors, subcontractors, suppliers or public or private institutions, act contrary to the fiduciary duties linked to their position.

3 Society governance system

The governance system adopted by the Company complies with current legislation and is aimed at ensuring maximum and more balanced collaboration between its components through a harmonious reconciliation of the different management, guidance and control roles.

This system is aimed at ensuring responsible management of the Company and transparent towards the market, with a view to achieving an economic balance valid over time and the pursuit of social and environmental objectives defined in agreement with the local authorities of reference.

The members of the corporate bodies must align their activities with the principles of correctness and integrity, refraining from acting in situations of conflict of interest in the context of the activity they carry out in the Company.

The members of the bodies are also required to behave in a manner inspired by the principles of autonomy, independence and respect for the guidelines that the Company has.

Their assiduous and informed participation in the Company's activities is required; they are required to make confidential use of the information they become aware of for office reasons and cannot use their position to obtain personal advantages, direct or indirect; any communication activity must comply with laws and conduct practices and must be aimed at safeguarding *price sensitive* and trade secret information.

The members of the Company's bodies are required to comply with current legislation and the principles contained in this Code.

The obligations of loyalty and confidentiality bind these subjects even after the termination of the relationship with the Company.

The Company adopts, due to its activities and organisational complexity, a system of delegations of powers and functions that provides, in explicit and specific terms, for the assignment of tasks to persons with appropriate skills and competence.

4 Internal control system

In compliance with current legislation and with a view to planning and managing company activities aimed at efficiency, correctness, transparency and quality, the Company adopts organisational and management measures suitable to prevent illegal behavior or in any case contrary to the rules of this Code by any person acting for the Company.

The Company implements organisation, management and control models that provide for appropriate measures to ensure the performance of activities in compliance with the law and the rules of conduct of this Code and to promptly detect and eliminate risk situations.

The Administrative Body is responsible for verifying and applying the rules contained in this Code.

4.1 Operating procedures and decision-making protocols

In order to prevent violations of current regulations, as well as of the Code of Ethics, the Company provides for the adoption of specific procedures ("Protocols"), by all those involved in the operational process, aimed at identifying the subjects responsible for the decision-making, authorization and execution of operations: it is necessary that the individual operations are carried out in the various phases by different subjects, whose competences are clearly defined and known within the organisation, so as to avoid attributing unlimited or excessive powers to individual subjects.

All shares and operations of the Company must have proper registration and it must be possible to verify the process of decision-making, authorisation and carrying out operations.

For each operation there must be an adequate documentary support in order to be able to proceed, at any time, to carry out checks that certify the characteristics and motivations of the operation and identify who authorized, carried out, registered and verified the operation itself.

5 Areas of application

5.1 Relations with customers / members

The Company carries out its activity, substantially, in favor of its Shareholders who can therefore be considered the last customers of the Company.

5.1.1 Equality and impartiality

The Company undertakes to satisfy its clients in fulfillment of the obligations set. The Company also undertakes not to discriminate against its customers.

The Company establishes a relationship with customers characterized by high professionalism and based on availability, respect, courtesy, research and the offer of maximum collaboration.

5.1.2 Transparency

The Company undertakes to promptly and appropriately communicate any information relating to any changes and variations in the service made.

5.1.3 Quality and customer satisfaction

The Company undertakes to guarantee the achievement of the quality and safety standards required by law.

5.1.4 Interaction with customers/members

The Company undertakes to facilitate interaction with customers through the management and rapid resolution of any complaints and using appropriate communication systems. The Company repudiates litigation as an instrument aimed at obtaining undue advantages and uses it on its own initiative only when its legitimate claims do not find due satisfaction in the interlocutor.

The Company protects the privacy of its customers, according to the regulations in force, undertaking not to communicate or disseminate the related personal and economic data, without prejudice to legal obligations.

5.2 Relations with staff

The "human factor" is the key resource of the Company: it is only thanks to it that maximum customer satisfaction can be achieved.

UNIT Scarl is therefore committed to selecting and maintaining personnel with skills appropriate to the role to be covered and the tasks to be performed.

5.2.1 Human resources management

UNIT Scarl does not tolerate any form of irregular work and exploitation.

Any discrimination based on race, sex, nationality, religion, language, trade union or political discrimination in recruitment, pay, promotion or dismissal shall be prohibited, and any form of favoritism.

The Company rejects any action that may constitute an abuse of authority and, more generally, that violates the dignity and psycho-physical integrity of the person. Throughout the duration of the employment relationship, employees and collaborators receive information that allows them to understand the nature of their assignment and that allow them to carry it out adequately, in compliance with their qualification.

The staff undertakes to comply, with diligence and loyalty, the obligations relating to their assignment.

5.2.2 Safety and health

The Company guarantees a working environment that complies with current safety and health regulations, through the monitoring, management and prevention of risks related to the performance of professional activity.

To this end, it promotes responsible and safe behavior 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 referred to in Legislative Decree 81/2008. The general measures to protect the health and safety of workers in the workplace are:

- a) the assessment of all health and safety risks;
- b) prevention planning, aimed at a complex that coherently integrates the Company's technical production conditions into prevention, as well as the influence of environmental factors and work organisation;
- c) the elimination of risks and, where this is not possible, their minimisation in relation to knowledge acquired on the basis of technical progress;
- d) compliance with ergonomie principles in the organisation of work, the design of workstations, the choice of equipment and the definition of working and production methods, in particular with a view to reducing the health effects of monotonous and repetitive work;
- e) risk reduction at source;
- f) the replacement of what is dangerous with what is not, or is less dangerous;
- g) limiting to a minimum the number of workers who are, or may be, exposed to the risk;
- h) the limited use of chemical, physical and biological agents in the workplace;
- i) the priority of collective protection measures over individual protection measures;
- j) health surveillance of workers;
- k) the removal of the worker from exposure to risk for health reasons inherent in his person

- and the entrustment, where possible, to another task;
- l) adequate information and training for workers; for managers, the persons in charge; for workers' safety representatives;
 - m) appropriate instructions for workers;
 - (n) the participation and consultation of workers and their safety representatives;
 - o) the planning of measures deemed appropriate to ensure the improvement of safety levels over time, including through the adoption of good practices;
 - p) emergency measures to be implemented in the event of first aid, firefighting, evacuation of workers and of serious and immediate danger;
 - q) the use of warning and safety signs;
 - r) the regular maintenance of environments, equipment, installations, with particular regard to safety devices in accordance with the manufacturer's indication.

5.2.3 Protection of the person

The Company undertakes to ensure compliance with the conditions necessary for the existence of a collaborative and non-hostile work environment and to prevent discriminatory behavior of any kind.

The collaboration of all is required in order to maintain a climate of mutual respect for the dignity, honour and reputation of each one.

Employees who believe they have suffered discrimination can report the incident to their manager who will proceed to ascertain the actual violation of the Code of Conduct.

Disparities which can be justified on the basis of objective criteria shall not constitute discrimination.

5.2.4 Personnel selection

Without prejudice to the obligations deriving from the provisions in force, the selection of personnel is subject to verification of the full compliance of the candidates with a substantial adherence to the professional profiles required by the Company, in compliance with equal opportunities for all interested parties.

The Company, as part of the personnel selection processes, does not commit any discrimination, direct or indirect, based on reasons of a trade union, political, religious, racial, language or sex nature.

The Company undertakes not to favor in any way candidates reported by third parties, and in particular those belonging to the Public Administrations. In case of reports of candidates to the heads of Functions, or to employees, by members of the Public Administrations, immediate communication will be given to the Administrative Body, which will proceed with the investigations it deems appropriate.

Any reports of candidates by managers of Company Departments will be subject to a similar procedure.

Notwithstanding the foregoing, if candidates to hold positions within the Company are linked by marital ties, kinship or affinity within the second degree with subjects belonging to the Public Administrations, immediate communication must be given to the Administrative Body, which will proceed with the investigations it deems appropriate.

5.2.5 Recruitment

The recruitment of staff takes place on the basis of regular employment contracts, as no form

of employment relationship is allowed that does not comply or in any case evasive of the provisions in force.

5.2.6 Staff duties

The staff undertakes to comply with the obligations set out in this Code and must comply, in the performance of their duties, with compliance with the law and base their conduct on the principles of integrity, correctness, loyalty and good faith.

An employee who has knowledge of alleged misconduct is required to disclose information in his possession regarding such conduct only to his superiors.

Employees are also obliged to:

- a. refrain from conduct contrary to these provisions and rules;
- b. contact your superiors for the necessary clarifications on the application methods of the Code or the reference regulations;
- c. promptly report to the Administrative Body any news regarding possible violations of the Code;
- d. cooperate with the Company in the event of any investigations aimed at verifying and possibly sanctioning possible violations.

5.2.7 Additional obligations for heads of corporate functions

Each Head of Company Function has the obligation to:

- a. ensure compliance with the Code by its direct subordinates;
- b. represent with their behavior an example for their subordinates and collaborators;
- c. ensure that employees understand that the provisions contained in the Code are an integral part of their work performance;
- d. select employees and collaborators who undertake to comply with the principles contained in the Code;
- e. promptly report to the Management any reports or needs from its subordinates.

Failure by the Function Managers to comply with the obligations referred to in this paragraph may result in the application of disciplinary sanctions, including dismissal.

5.2.8 Use of company time and assets

Employees and collaborators of the Company may not carry out, during working hours, other activities that are extraneous or incongruent with their duties or organisational responsibilities.

Their use, in compliance with established safety procedures, must be used to carry out the company's activity.

The employee uses and carefully guards the goods available to him for work purposes. The non-conforming use of the assets and resources owned by the Company is not permitted. By way of example and not exhaustive, the posting in the workplace of erotic, pornographic images, or in any case contrary to public order, morality, decency and detrimental to the common sense of modesty and human dignity concretizes a different use of company assets.

Each employee is directly and personally responsible for the protection and legitimate use of the assets and resources entrusted to him for the performance of his duties.

The Company, in compliance with the laws in force, takes the necessary measures in order to

prevent distorted use of the same.

5.2.9 Conflict of interest

The director, the employee, must maintain a position of autonomy and integrity in order to avoid making decisions or carrying out activities in situations, even if only apparent, of conflict of interest with respect to the Company's activity.

Any activity that conflicts with the proper performance of its duties or that may harm the interests and image of the Company must be avoided. Any situation of conflict of interest, real or potential, must be communicated in advance to the Administrative Body.

5.2.10 Use of computer systems

With respect to the use of computer systems, each employee is responsible for the security of the systems used and is subject to the regulatory provisions in force and the conditions of the license agreements.

Except as provided for by civil and criminal laws, the use of network connections for purposes other than those related to the employment relationship or to send offensive messages or that may cause damage to the image of the Company is part of the improper use of company assets and resources.

Each employee is also required to make the necessary efforts in order to prevent the possible commission of crimes through the use of IT tools.

5.2.11 Obligations of employees

The provisions referred to in the previous points are extended to all possible collaborators, consultants, agents and agents of the Company.

5.3 *Relations with contractual partners*

The contractual partners of the Company make possible, with their collaboration, the concrete realization of the business activity. UNIT Scarl respects their important contribution, committing itself to dealing with them on equal terms and mutual respect.

In the selection of contractual partners, carried out through clear, certain and non-discriminatory procedures, the Company uses exclusively criteria related to the objective competitiveness of the services and products offered and their quality, also understood as the supplier's compliance with the ethical parameters expressed in the Code.

5.4 *Relations with public institutions and other external subjects*

5.4.1 Public Administrations

All relations between the Company and the Public Administration are based on principles of correctness, transparency, collaboration, respecting each other's roles.

In order to ensure maximum clarity in institutional relations, these are entertained exclusively through contact persons who have received an explicit mandate from the corporate bodies and who are not in situations of conflict of interest with respect to the representatives of the institutions themselves.

UNIT Scarl rejects any behavior that can be interpreted as collusive or otherwise likely to prejudice the aforementioned principles.

In particular, it is strictly forbidden to provide or promise payments or fees, in any form, directly

or through others, to induce, facilitate or remunerate a decision, the fulfillment of an act of office or contrary to the duties of office, of the Public Administration.

The directors, employees and collaborators of the Company, if they receive explicit or implicit requests for benefits of any kind from the Public Administration or from natural or legal persons acting for or on behalf of the same, must immediately suspend all relations and inform the Administrative Body in writing.

In any case, this type of expenditure must be authorised and documented in an appropriate manner.

The provisions of this Article shall not be circumvented by resorting to other forms of aid or contributions, such as sponsorship, assignments, advice, advertising, bonuses.

During a business negotiation, or commercial relationship with the Public Administration, no actions should be taken, directly or indirectly, that may propose employment and / or commercial opportunities from which advantages derive, for themselves or for others, to the employees of the P.A. or their relatives or relatives.

In the event that the company is represented by a "third party" in relations with the P.A., the same directives apply to the consultant and his staff as apply to the Company.

5.4.2 Social initiatives, protection of the environment and cultural heritage

UNIT Scarl promotes support activities in favor of subjects engaged in initiatives aimed at protecting the cultural, environmental and social heritage of the territory.

The recipients of this Code must not in any way commit or contribute with others to violate the legislation on crimes against cultural heritage (art. 25-septiesdecies and art. 25-duodevicies D.Lgs. n. 231/2001).

5.4.3 Trade unions, associations and political parties

UNIT Scarl is committed to ensuring dialogue and communication paths with all stakeholders: internal (employees, trade unions) and external (citizens, shareholders, public bodies, associations, etc.), committing itself to taking into account their requests, communicating their company performance and involving them, where possible, in achieving company objectives, as part of a policy of transparency and participation in corporate life.

5.4.4 Employment relationships with former employees of the Public Administration

Without prejudice to the provisions of the previous paragraph, the recruitment of former employees of the Public Administration, who in the exercise of their functions have had relations with UNIT Scarl, or their relatives and / or relatives within the second degree, takes place in strict compliance with the standard procedures defined by the Company for the selection of personnel.

Even the definition of other employment relationships with former employees of the Public Administration, or with their relatives and / or relatives, takes place in strict compliance with standard procedures.

5.5 *Participation in tenders and relations with clients*

5.5.1 Participation in competitive comparison procedures

UNIT Scarl undertakes to promptly provide the contracting authorities with truthful and complete information, following the principles of transparency and correctness.

With regard to competing companies in participating in tenders or competitive comparison

procedures, UNIT Scarl undertakes to behave with the utmost fairness.

The company undertakes to participate in tenders and competitive comparison procedures, rejecting in any way collusive behavior with other participants or with the contracting authority that could alter competition and the proper conduct of the procedure.

5.5.2 Fairness in business negotiations

In relations with the client UNIT Scarl ensures fairness and clarity in commercial negotiations and in the assumption of contractual obligations, as well as the faithful and diligent fulfillment of the same.

5.6 *Relations with suppliers*

5.6.1 Choice of supplier

The methods of choosing the supplier must comply with the regulations in force and the internal procedures of the Company provided for this purpose.

The choice of supplier and the purchase of goods and services of all kinds must be made in compliance with the principles of competition and equal conditions of tenderers and on the basis of objective assessments of the competitiveness, quality, usefulness and price of the supply.

In the selection UNIT Scarl adopts objective and transparent criteria provided for by current legislation and internal regulations and does not preclude any supplier company, in possession of the required requirements, the possibility of competing to win a contract with it.

In selecting the supplier, the Company must also take into account the ability to ensure the implementation of adequate company quality systems, where applicable, the availability of means and organisational structures and the ability to meet confidentiality obligations.

5.6.2 Transparency

Relations with the Company's suppliers, including financial and consultancy contracts, are governed by the provisions of this Code and are subject to constant and careful monitoring by the Company also in terms of the adequacy of the services or goods provided with respect to the agreed consideration.

The Company prepares appropriate procedures to ensure maximum transparency in the selection of suppliers and the purchase of goods and services.

An accurate system of documentation of the entire selection and purchase procedure is provided to allow the reconstruction of each operation.

5.6.3 Fairness and diligence in the execution of contracts

The Company and the supplier must work in order to build a collaborative relationship and mutual trust.

UNIT Scarl 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 current regulations as well as the expectations of the counterparty, given the circumstances, negotiations and content of the contract.

The fulfillment of contractual services by the supplier must comply with the principles of fairness, fairness, diligence and good faith and must take place in compliance with current legislation.

5.7 Relations with the press and external communications

UNIT Scarl recognises the fundamental informative role played by the media towards the outside world. To this end, it undertakes to cooperate fully with all media outlets, without discrimination, respecting each other's roles and corporate confidentiality requirements, in order to respond promptly, completely and transparently to their information needs.

The Company takes care of the drafting of publications of general interest and the maintenance of an institutional website that is complete and effective.

The Company's personnel are not authorized to provide information to the media without the authorization of the competent functions.

6 Implementing rules

6.1 Adoption and dissemination

The Code of Ethics and any future updates are defined and approved by the Company's administrative body.

It shall be published with appropriate prominence on the website.

A paper copy is distributed to current and future staff and collaborators, requiring them to declare receipt in writing.

6.2 Information requirements

All directors, collaborators in various capacities and employees are required to promptly and confidentially report to their department manager any information they have become aware of in the performance of their work activities, regarding violations of legal regulations, the Code of Conduct or other company provisions that may, for any reason, involve the Company.

The function managers must supervise the work of their employees and must inform the Administrative Body or, if necessary, the authorities in charge of any possible violation of the aforementioned rules.

The Administrative Body will act in such a way as to guarantee the whistleblowers against any form of retaliation, discrimination or penalization, also ensuring the confidentiality of the identity of the same, without prejudice to any legal obligations and the protection of the rights of persons wrongly accused and / or in bad faith.

6.3 Contractual value of the Code of Ethics

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 Italian Civil Code.

The 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), collective labour agreements and disciplinary codes adopted by the Company.

6.4 Reporting problems or suspected violations

Anyone who becomes aware, or is reasonably convinced of the existence of a violation of this Code, of a specific law or of company procedures, has the duty to immediately inform their manager or contact person and / or the Administrative Body or the authorities in charge.

The report must be made in writing and in a non-anonymous form. The Company puts in place the necessary precautions to protect whistleblowers from any type of retaliation. To this end, the confidentiality of the identity of the whistleblower is ensured, without prejudice to legal obligations.

The responsibility for carrying out investigations into possible violations of the Code of Ethics lies with the Administrative Body, which may possibly hear the author of the report, as well as the person responsible for the alleged violation: the staff is required to cooperate fully in any internal investigations.

6.5 Disciplinary measures resulting from violations

The provisions of this Code are an integral part of the contractual obligations assumed by the staff, as well as by the subjects having business relations with the Company. The violation of the principles and behaviors indicated in the Code of Ethics compromises the fiduciary relationship between the Company and the authors of the violation, whether they are directors, employees, consultants, collaborators, customers or suppliers and may give rise to sanctions of various kinds.

In the event of violations of the Code of Ethics, the Company adopts disciplinary measures towards those responsible for the violations themselves - where deemed necessary for the protection of corporate interests and consistent with the provisions of the current regulatory framework - which can go as far as the removal from the Company of the same managers, as provided for by the Disciplinary System. The Company, in verified cases of violation of the principles of the Code of Ethics that also present the extremes of crime, reserves the right to proceed judicially against the subjects involved.