

CODE OF ETHICS

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1. INTRODUCTION

TECRA SRL always operates according to the principles of honesty, transparency, fairness and integrity as formalized in the Code of Ethics.

The regulations included in the Code of Ethics are valid for all colleagues, consultants, partners with any kind of contract and assignment and to any position, in addition to business partners, to the manager, to temporary and permanent employees and to any man or woman who directly and indirectly has any temporary or permanent business relationship with **TECRA SRL**.

The Regulations of the Code of Ethics supplement the national and international legislation in force, especially with reference to the principles and duties of fairness, diligence and good faith which all the consignees must comply with during their work.

TECRA SRL, when any employment or partnership contract is signed or in case of completing a job/consulting order, will sign and provide a copy of the Code of Ethics. In case of violation of the obligations arising from this Code, specific regulations and termination/sunset clauses will be added in entrustment acts and acquisition agreements regarding partnership, consultancy and services.

For this reason, all the recipients must know the content of this document and properly apply it without delays and obstacles that could make any check **by TECRA SRL** difficult. The recipients, besides adapting their behaviour to the Code, are obliged to report any violation of the Code itself on behalf of partners, employees or third parties.

Due to its importance, this Code of Ethics must be published on the website and sent by email, or by any similar means, to all partners, consultants and employees.

2. BASIC ETHICAL PRINCIPLES

In carrying out its activity, **TECRA SRL** is always guided by and always complies with the principles hereunder:

Fairness and honesty

TECRA SRL complies with internal regulations besides the general principles of integrity, fairness, good faith, impartiality, transparency, equity and good sense.

Since a company and people's interests pursuit should never justify a behaviour which is against the principles of fairness and honesty, activities are carried out in full respect of the rules in force, professional ethics and internal regulations.

Impartiality

In relationships with all the interlocutors, **TECRA SRL** denies any form of discrimination based on age, racial and ethnic origin, nationality, political opinions, religious beliefs, gender, sexuality and state of health of the stakeholders. In particular, any arbitrary form of advantage or disadvantage is granted to its employees, partners, suppliers, customers and institutions.

Professionalism and human resources development

TECRA SRL is highly engaged in human resources skills and know-how development, providing them with adequate training tools, professional and skills development with the aim of enhancing this source of value.

In this way, the company can ensure a high level of professionalism towards any external partners.

Workplace safety

TECRA SRL ensures that all the employees and any partner work in safe and healthy environments and in working conditions which respect the dignity of individuals in full respect of the national and international rules in force regarding health and safety workers' safeguard in their workplaces.

Confidentiality

In compliance with regulations, **TECRA SRL** ensures strict confidence in the information held and related to the interlocutors (employees, customers, suppliers etc). Some information could be given to third parties only in full respect of the legislation in force or according to precise agreements among the Parties. It is strictly forbidden to all people dealing with the company to use confidential information for purposes different from those related to their professional position.

Conflicts of interest

In its performance, **TECRA SRL** is committed to avoid any real or potential situation of conflicts of interest.

Free and fair competition

TECRA SRL acknowledges that free and fair competition is a key factor in a continuous process of growth and improvement for companies and the market. For this reason, the basic principles include also fair competition among competitors.

Transparency and completeness of information

The Code establishes **TECRA SRL** ethical commitment and consequent legal obligation to comply with the legislation in force besides always acting according to transparent and fair rules of behaviour. For this reason, the company undertakes to spread information regarding the activities done and to be done in the clearest and most transparent, adequate and complete way.

Doing so, the recipients could take conscious decisions upon the relationships with the company and verify the coherence between stated goals and achieved results.

Environmental safeguard

Any choice is made ensuring compatibility between economic and environmental needs, not only in compliance with the legislation in force, but also considering continuous scientific research progress and the best modern technological solutions.

Condemnation of all forms of corruption

The company complies with and demands respect of the legislation in force concerning combating and preventing corruption to all people with a relationship with the company itself. It denies any form of behaviour that can be defined as corruption, attempted corruption or persuasion to corruption.

3. CODE OF CONDUCT

Gifts, rewards and other benefits

TECRA SRL neither demands nor accepts any gift, reward or benefits for itself and others, even of modest value and above the normal relations of courtesy.

Talking about modest value gifts or benefits means with an economic value lower than 50 €, also in the form of discount. In this case, they can be received and accepted without exceeding the maximum limit allowed in the calendar year.

Relations with the Public Administration and public officials

Public administration is any public institution, any independent administrative agency, any natural or legal person acting as public official, public service representative or member of an European Union body.

In those cases in which it is clear there are a conflict of interest or serious reasons of convenience, TECRA SRL cannot be represented by third parties in relationships with the public administration. It is forbidden to promise and offer cash, benefits and other utilities as well as any other good or service, directly or indirectly (doing so vicariously) to Public Officials/public service representatives and government employees, to their relatives or kin and cohabitants (Italian or foreign), with the aim of favoring or damaging a party to civil, criminal or administrative legal proceedings leading to direct/indirect interest or advantage for the company itself. This kind of conduct are forbidden both for corporate bodies and employees and any person acting on behalf of TECRA SRL such as consultants, partners, agents and third parties.

Relations with businessmen and private individuals

TECRA SRL does not behave in a way that could damage its image and reputation. In all relations with the recipients of a service, it ensures equal treatment, all else being equal, avoiding any action that could generate discrimination base on sex, nationality, ethnic origin, general characteristics, language, religion or belief, personal and political opinions, membership to a minority, disability, social and health conditions, age and sexual preference and on any other elements.

When signing agreements and contracts and during their execution, our company neither refers to third party mediation nor grant any utility as intermediation to encourage the signature of the contract. In case in which the company decides to take in charge agents, it will regulate the contractual relationship imposing the acceptance of non-corruption behaviour, financial checks, economic conditions based on transparency and traceability.

To fulfil a contract, the company complies with what is established in the contract itself refusing any action by third party with the aim of obtaining certifications without following the usual training process.

Corruption prevention

TECRA SRL respects offences prevention measures with the obligation to denounce to judicial authority. It encourages employees and partners to inform the Manager for Corruption Prevention in case of misconduct including, without limitation, failure to abstaining from any actions in case of conflict of interest.

4.DETAILED RULES FOR THE APPLICATION OF THE CODE OF ETHICS

In order to make the Code more visible, it is published on the company website <https://tecratubes.com/>.

This Code and its future updates are established and approved by the top management. **TECRA SRL** ensures the dissemination of the principles of the Code to all the interlocutors which a business agreement has been signed or will be signed with, with particular attention to human resources and partners.

Monitoring and violation punishment

Through top management, the company is engaged to enforce the application of the Code by the recipients, also in case of warnings (including anonymous ones) that can be sent by email or mail.

Maximum confidentiality is ensured to those who report any violation to the Code.

Code Validity

This Code is valid for a year starting from the top management approval. It is re-examined once a year and it can be completed and updated. In case it is required, it can be updated within a reasonable time.

Violations of the Code of Ethics

In case of established violations of the Code of Ethics, Tecra will implement the most adequate sanctions safeguarding the company interests in full respect to the legislation in force and to the collective labour agreements.

Among sanctions, there are:

- disciplinary sanctions as established by the collective labour agreements;
- termination of the contract;
- application of penalty clauses, where applicable;
- claim for damages (including damage to the image).

Lodi, 25/05/2025

