



## CODE OF ETHICS

# HOW TO READ THE CODE OF ETHICS

**P**private life, as well as the working environment, are obviously influenced by our behavior. *Being competent from a technical point of view and excelling in our work is a necessary condition in order to achieve the objectives that the business require us, but it is not enough. What makes the difference, actually, is to be valued by our customers, employees, business partners and act correctly.*

*This code of ethics measures the behavioral pillars on which we base our being a company so that our work is not only appreciated but also becomes a reliable point of reference for all the people who have relationships, in various ways, with our company.*

*Adhering to values has a tangible impact on the company's performance and in resonance it strengthens the brand and the reputation, it allows us to attract and retain the best talents, protect our staff, our brand and also our financial performance.*

*This Code of Ethics represents our ideal values. It will not always prevent all individual fragilities or offline behaviors, but it will help to recognize them as incorrect so that we can get back on track.*

*Good work to you all!*

Maurizio Di Cosimo  
CEO



# INDEX



## PREMISE DEFINITION



## HUMAN RESOURCES

Respect for the person  
Respect among people  
A safe working environment  
Selection and inclusion in Axcent



## RULES OF CONDUCT IN THE COMPANY

Company assets  
The use of telecommunications system  
The use of social media  
External communication  
Confidentiality of personal data  
The confidentiality of company data - Confidentiality  
Correct and transparent conduct  
Gift, presents and promises of favours  
Alcohol and drugs



## THE ENVIRONMENT



## THE MARKET

### Our customers:

- Impartiality and integrity
- Confidentiality of information
- Quality control

### Suppliers:

- Choice of suppliers
- Integrity in relationships
- Conflict of interest
- Illegal business activities



## THE CONTROL INSTITUTIONES AND BODIES

- Institutional relations
- Favoritism
- Alteration of computer systems
- Accounting records and internal control
- Control

# PREMESSA

*Axcent assume quale principio alla base di ogni suo operato il rispetto delle leggi e, più in generale, di tutte le norme vigenti in Italia e nei paesi nei quali opera.*

# DEFINITIONS

**AXCENT** - means any company in the Axcent network (Axcent Srl, Axcent System Engineering Srl, Axcent Technology Solutions Srl, Axcent South America, Axcent South Africa, Process IT), wherever it operates.

**SOCIETÀ** – see. “Axcent”

**DESTINATARIO** -All persons who have a position in the company, whether they are representative as heads, managers, managers or employees and any person who collaborates in the group even if not bound by a subordinate employment relationship, representatives, promoters, suppliers of goods and services and anyone who has an interest in Axcent.

**SUPERIORE DIRETTO** - The first person in charge, the boss, to whom each resource refers in his or her daily activity and from whom he or she receives operational instructions.

# 1. HUMAN RESOURCES

## Respect for the person

At Axcent, we place human resources at the heart of our operations. For us, it is also an essential prerequisite for our growth. We protect the respect of resources, we adopt inclusive attitudes, we promote diversity, we are convinced that it is the basis of professional and human growth; we appreciate and recognize the contributions coming from every subject or role and we show trust in all colleagues believing in each one's abilities and in their good intentions. We treat each other with respect and create a healthy and friendly work environment. Each of our goals is a common goal, achieved through teamwork in which everyone provides their own ingenuity and the right expertise, feeling the responsibility to achieve the desired results. We trust that everyone will give their best, that they will take the initiative in adverse circumstances but that they will not be afraid to turn to someone for any kind of constructive confrontation

## Respect among people

All our interaction is based on the principle of fairness. Respect for the rights of others goes beyond mere formal compliance with legal or contractual provisions. At Axcent

we are against any kind of discrimination and/or harassment. We promote a tolerant work environment that respects human dignity. We do not tolerate a lack of loyalty and prevarication towards colleagues, collaborators and staff outside the company. Anyone in a higher hierarchical position must exercise their role fairly and correctly, working to ensure that their function is perceived as authoritative, but not vexatious.

## A safe working environment

At Axcent we are committed to ensuring and spreading a culture of safety that helps to develop a consolidated perception of transversal and specific risks in order to adopt responsible and safe behavior.

We also guarantee preventive actions to safeguard the health and safety of all workers, including training and promotion of their well-being. All workers are required to comply with safety regulations and report any type of non-compliance in terms of health and safety measures, creating a proactive environment and a culture of safety that goes beyond the laws of reference.

In order to ensure the health and safety standards of Axcent's workers:

- We periodically carry out the activities of risk assessment and the preparation of preventive measures and consequent protection;
- We respect the technical and structural standards of the law relating to equipment, plants, workplaces, chemical, physical and biological agents;
- We organize evacuation and first aid tests;
- We manage the contract activities taking care that the recipients of the contract follow rules of conduct, prevention and protection that ensure safety conditions of the same level as those provided for the staff of Axcent;
- We allow the workers' safety representatives to carry out their duties objectively and independently;
- We organize internal health surveillance activities;
- We inform the operational resources about the risks and suitable prevention activities and to train them adequately on these issues;
- We ensure that the operating resources comply with the procedures and instructions for safe work;
- We acquire the documentation and certifications required by law;
- We periodically check the application and effectiveness of the procedures adopted.

## Selection and inclusion in Axcent

At Axcent, the selection, hiring and on-boarding process is impartial, based on equal opportunities and on the personal and professional characteristics of the person. We exclude any form of discrimination based on gender, ethnicity, language, religion, political opinions, personal conditions, social and sexual orientation.. We ensure that all employment relationships are framed in regular employment/collaboration agreements and that clear and comprehensive information is provided with respect to the regulatory elements governing the employment or collaboration relationships with Axcent at the time of the conclusion of the contract. For the performance of the employment or collaboration relationship:

- We set specific and concrete objectives;
- We offer working conditions that respect individual dignity;
- We offer information and knowledge tools to enhance the specific skills;
- We involve workers, as far as possible, in decisions relating to the manner of carrying out the tasks entrusted to them.



*" To work safely,  
you must think safe."*

# 2. RULES OF CONDUCT IN THE COMPANY

## Company assets

Every Recipient who has at his disposal company property (assets), suitably supplied to carry out his work, must use them with diligence and scrupulousness, avoiding improper use that could in any way cause direct or indirect damage to the company.

They are required to promptly report any anomaly or harmful event to the relevant functions.

## The use of telecommunication system

The mobile telephone systems, e-mail, Internet and Intranet belong to the Axcent companies. The telecommunication systems we provide have two main purposes:

- To facilitate and improve the performance of the working activity;
- To increase the effectiveness of internal and external communication.

Each Recipient must therefore bear in mind that:

- The use of telecommunication systems must take place only and exclusively for professional purposes;
- The information allocated to company systems is the property of the company;
- Passwords and access codes must be kept with diligence and confidentiality, the responsibility for the secrecy of the information remains, in fact, with the worker;
- Any type of problem regarding the information systems must be promptly communicated to the company manager of reference;
- Software is subject to licensing. Voluntary and involuntary duplication is absolutely forbidden. Breaching the rules entails the risk of serious penalties for companies
- The contents of e-mail messages must always be characterized by a suitable language and never insulting, avoiding inappropriate comments or that could disturb the soul of the recipients causing damage to the image of the company.

## The use of social media

As a factor in the development of business and corporate brand, in Axcent we adopt an integrated internal and external communication policy, with the use of social networks such as Facebook, LinkedIn, Instagram, Twitter, YouTube, corporate blogs, and the like.

In order to avoid unpleasant misunderstandings and damage to the image of our companies, we invite all Recipients of this code to respect the moral principles and language properties appropriate to the business environment, always in mutual respect and the community of which you take part.

## External communication

All information and activities concerning the company (speeches, slides, catalogues, advertising material and the like) must be provided to the outside world by the Recipients in a coordinated manner only after verification of the contents by the collaborators responsible for communication to the media and

the HR department.

## Confidentiality of personal data

We are committed to processing the significant amount of personal data and information we receive, in accordance with applicable privacy laws. In particular:

- We collect data only if expressly authorized to do so;
- We exercise the utmost diligence in their storage;
- We do not communicate or in any way disclose personal data to unauthorized third parties.



*"The company's assets are mine, yours and ours. They must be treated with care."*

## The confidentiality of Company Data - Confidentiality

At Axcent we promote the principle of confidentiality as an ethical value, i.e. the use of information with ownership and fairness, in respect of entities and persons.

The knowledge that is developed in Axcent must remain a wealth of the company and the worker. Improper disclosure of company information would represent a significant damage to companies. Therefore, each Recipient is required to:

- DO NOT outsource any information concerning Axcent either during or after the termination of the employment relationship;
- Always consider all appropriate precautions to prevent confidential information from being disclosed, even unintentionally;
- Never leave your PC, USB stick, CD, etc. unattended.

## Correct and transparent conduct

At Axcent, we require that all Recipients of the Code of Ethics maintain a correct and transparent conduct in the performance of the tasks entrusted to them, respecting the regulations in force and this Code of Ethics. We aim to main-

tain, in any circumstance, a respectful conduct of others. For us, the sharing of the values contained in the Code of Ethics is a necessary condition for the initiation and/or continuation of the employment/collaboration relationship. Adopting attitudes that conflict with these ethical principles may result in disciplinary measures in accordance with the regulations, the contracts in force and the internal disciplinary code.

## Gift, presents and promises of favours

In the course of commercial or institutional relations with customers and suppliers (public or private) and institutions, at Axcent we intend to apply an integral, correct and transparent conduct. To this end, it is expressly forbidden:

- offer gifts, donations, benefits, even indirect, goods, services and services or favors that go beyond ordinary courtesy and custom in relation to the activity carried out;
- accept donations, gifts and benefits, even indirect, that go beyond ordinary courtesy, and offers for any reason by customers, suppliers and the Public Administration. If directors, employees and collaborators of Axcent receive donations, gifts or favorable treatment, they must immediately inform

their supervisor;

- examine or propose or promise employment and/or commercial opportunities that may improperly and personally benefit officials of the Public Administration or customers/suppliers with the benefit of Axcent.

## Alcohol and drugs

The consumption of alcoholic beverages with neither low nor high alcohol content is not permitted in the workplace or during working hours. Only in occasion of festivities and institutional moments (e.g. Christmas toasts) a MODERATE consumption of low-alcohol drinks is allowed.

It is also absolutely forbidden:

- To keep, consume or give up any type of narcotic substance or alcohol during working hours and in the workplace in general;
- Consume drugs and/or alcohol before starting work;
- Smoking in the workplace and/or in the common areas inside the buildings where we operate. The prohibition is also extended to electronic cigarettes or similar.

# 3. THE ENVIRONMENT

At Axcent we know the importance of adopting an internal policy to preserve the environment around us.

This attention is made explicit through internal awareness initiatives and the implementation of the following actions:

- The reduction of water consumption through operating instructions and awareness on the proper use of health services;
- The exploitation of natural light compared to artificial light (where possible);
- The reduction of greenhouse gas emissions through initiatives to encourage the use of public transport, where possible;
- The reduction of plastic material and disposable objects inside the offices;
- Recycling paper and reducing the number of prints;
- Waste sorting in all our offices.

The objective that we set ourselves year after year is to make all employees and collaborators aware of the importance of improving the environmental conditions of the planet that hosts us, welcoming also any type of internal or external eco-solidarity initiative, also from the technological point of view.



# 4. THE MARKET

## Our customers

### Impartiality and integrity

At Axcent we support a transparent and fair relationship with each of our customers. All information we provide about our products and services is true, accurate and comprehensive. In our contracts we use clear and easily understandable language without neglecting any element relevant to the customer's decision. In the event of unforeseen circumstances, we clearly and correctly inform customers of the changed situation, always seeking shared solutions, with willingness and collaborative spirit.

Our goal is to provide our customers with products and services of high quality and usefulness that match their needs.

### Confidentiality of information

Every Recipient knows that any sensitive information about our Customers must remain confidential.

We all undertake to keep confidential all the information of which we have come to our knowledge during the exercise of our fun-

ction and/or assignment assigned to us and not to use such information, even if obtained legitimately, for purposes not connected with the exercise of our activity.

### Quality control

At Axcent we are always committed to ensuring high standards on the quality of the products and services we offer and to periodically monitor the quality perceived by customers.

## Suppliers

### Choice of suppliers

Our business functions responsible for selecting suppliers and purchasing goods and services act on the basis of impartiality, quality, efficiency, sustainability and cost-effectiveness requirements to protect our business interests and ensure sufficient competition for each supply request (e.g. by considering more companies in the selection process). For us, a prerequisite for establishing business relationships is that we adhere to and share our ethical and safety values, including

those of our suppliers.

### Integrity in relationships

In all relations with suppliers, we avoid any form of mutual dependence. All employees involved in purchasing processes maintain a frank and open dialogue with them, in line with good practice, and work to obtain their cooperation in ensuring the satisfaction of the needs in terms of quality, cost and delivery time; however, they are and must remain free from personal obligations to suppliers, reporting to their direct superiors any attempt to alter these normal business relationships.

The fees are exclusively commensurate with the services indicated in the contract and payments may in no way be made to a person other than the contractual counterparty, except in cases of assignment of the receivable.

We do not appreciate favoritism, collusion, corruption, direct and/or indirect solicitations also through promises of personal advantages between customers, suppliers of goods and services, supervisory bodies and control

bodies.

#### Conflict of interest

We respect the right of all Recipients to participate in investments or business outside the workplace, provided that it is:

- Legal activities and compatible with the contractual obligations undertaken;
- Activities that do not conflict with the interests of each company in the Axcent network.

By way of example and not limited to examples of situations that may cause conflict of interest are:

- Participate in decisions concerning business with companies, companies or entities in which the employee or a family member of the employee has an interest or even when such decisions may result in a personal advantage for an employee or a family member of the same;
- Use the name of the Axcent company to obtain personal or third-party benefits;

- Use your position in the Company or business information and opportunities acquired in the performance of your duties, for your own benefit or that of a third party.

In carrying out their activities, each Recipient must work to avoid incurring in such situations of conflict of interest, real or even only potential, and, if necessary, promptly report it.

#### Illegal business activities

At Axcent we reject any form of illegality, we make every effort and take the utmost care not to be involved in activities that involve money laundering (i.e. the acceptance or processing) of income derived from criminal activities of any form, including those related to the financing of terrorism.

In the selection of personnel, suppliers and customers, we verify in advance the information made available to us and ensure that their conduct is appropriate to eliminate any suspicion of links with national and interna-

tional criminal and terrorist organizations. We check the respectability of our business partners and suppliers before establishing any business relationship. We only make payments for goods and services provided to us through approved and documented means of transfer.

To ensure that financial flows are transparent, any person making payments, transactions or transactions with sums of money, goods or other economic benefits must provide specific evidence of their actions so as to allow easy control over the characteristics and reasons that have required and permitted their execution.

# 5. THE CONTROL INSTITUTIONS AND BODIES

## Institutional relations

At Axcent, we maintain relations with national, EU and international public institutions in compliance with current legislation and in a spirit of integrity, fairness and transparency.

We allow contacts with institutions to be reserved for appropriately delegated internal functions or to those who have received an appropriate mandate.

We undertake to establish, without discrimination, constructive and loyal relations with bodies, officials, committees, consultants, public officials or persons in charge of public affairs and national and international interlocutors, only in the interests of the companies of the Axcent network.

## Favoritism (Public Administration Sector)

We do not accept any behavior consisting in

promising favoritism, personal advantages, artifices, deceptions, illegal payments, gifts of a significant nature, soliciting and obtaining confidential information that compromises the integrity of the relationship with public officials and public service employees, and/or any person belonging to the Public Administration, also and above all in Calls for Tenders and in any situation in which equal treatment is violated in procedures of public evidence.

We also do not allow the preparation of false documentation or statements altered in any practice of obtaining and disbursing public funds. We guarantee that contributions, subsidies or financing aimed at favoring any initiative, obtained from the State or from another public body or from the European communities, even of a modest value and/or amount, will be used for their intended purpose.

## Alteration of computer system

We condemn any behavior that alters the operation of an information system or computer, then access without right to data, information or programs in order to procure unfair profits to Axcent to the detriment of the State.

## Accounting records and internal control

Our principles of transparency, correctness and truthfulness apply especially to the preparation and internal recording of all accounting documents, every accounting operation must therefore be supported by appropriate documentation. Each Recipient is responsible for the information and documentation handled and must proceed to filing according to logical criteria in order to facilitate consultation.

In particular, we ensure that:

- We clearly draw up the financial statements and corporate communications required by law, representing the economic, equity and financial situation in a correct and truthful manner;
- We do not prevent or in any case hinder the performance of control activities by the persons in charge; .

duct that departs from this Code of Ethics, to which he or she assists or of which he or she becomes aware with respect to any context mentioned above and any others that may be deemed appropriate. No employee may be subject to disciplinary proceedings in the event of incorrect reports made in good faith.

## Control

We are committed to maintaining an efficient Internal Audit function, so that it operates independently and objectively, always in line with international professional standards. We recognize the importance of adequate internal control to ensure the reliability and credibility of the information we provide. Each individual must feel responsible for the proper functioning of the internal control system and is required to report to the Internal Audit system and its superior manager any con-

IS YOUR CONDUCT CONSISTENT WITH OUR CODE OF ETHICS? HERE ARE SOME EXAMPLES OF QUESTIONS YOU CAN ASK:

- *Is this activity legal?*
  - *What are the potential consequences of my actions?*
- *Does this activity make me or my colleagues feel uncomfortable?*
- *Could this activity give the impression of being immoral?*
- *How would I feel if I did absolutely nothing about it?*
- *Is my manager aware of and approves of this activity?*
  - *Could my action harm the company?*