

**TESTING AND
MEASUREMENT DIVISION**

The entire **INTEK S.p.A.** corporate structure operates according to the "**code of ethics**" imposed and approved by the Company's Statutory Bodies in order to **avoid immoral conduct at any level** that may generate judicial problems and/or potentially damage the reputation of the Company.

The range of **immoral conduct** is wide and includes, for example:

falsehood and/or non-compliance with the laws and regulations in force in administrative or technical activities, corruption, collusive behavior, forgery in the drafting of the Test Reports, gifts, bribes, extortion, nepotism, money laundering, misuse of internal information, use of intermediaries, conflicts of interest, fraud, discrimination, sexual abuse, job safety, environmental pollution.

Respect for the "**code of ethics**" justifies the affirmation that **INTEK S.p.A.** operates according to principles of:

- **reliability** that includes honesty, maintenance of promises, integrity, transparency, reliability, loyalty
- **respect** that includes respect for human rights
- **responsibility** at all levels and for any administrative and/or technical activity
- **justice** that includes impartiality and fairness
- **concern** that includes sensitivity to others in avoiding harm
- **sense of civic duty** that requires obedience of laws, community support and environmental protection

All **INTEK S.p.A.** Staff is committed to complying with the company's code of ethics where **INTEK Staff** is defined as,

- **in first place, AD/DG/DL**
- the administrative body
- the trade union college
- the entire corporate structure, management, or associates
- employees of any technical or commercial position and/or level
- administrative employees and/or consultants for administrative activities and/or **P.A. interfacing**
- contracted and/or temporary consultants

Furthermore, compliance with the "**code of ethics**" specifically applies to the following points:

- 1 **COMPLIANCE TO LEGAL AND CORPORATE OBLIGATIONS**
- 2 **DATA CORRECTNESS AND TRANSPARENCY, CORRUPTION AND ANTICOLLUSIVE BEHAVIOR**
- 3 **STAFF TREATMENT**
- 4 **SAFETY AND OCCUPATIONAL HEALTH FOR AND WORKERS AND WORKPLACE**
- 5 **REGULATION GDPR 2016/679**
- 5 **INDEPENDENCE, IMPARTIALITY, AND INTEGRITY**
- 6 **CONFIDENTIALITY**

must apply, to the extent applicable, to all **THE STAKEHOLDERS** with whom **INTEK S.p.A.** has dealings of any kind, for example, with INSTITUTIONS OF ACCREDITATION and/or ENTITIES with whom **INTEK S.p.A.** has agreements, contracts or conventions, Equipment and/or Service **Providers, Customers, Banks, Law Firms**, and in a broader sense, anyone with dealings with **INTEK S.p.A.**

A summary of the ethical principles of **INTEK S.p.A.**, as implemented, are set out in the following paragraphs.

1 COMPLIANCE WITH LEGAL AND CORPORATE OBLIGATIONS

INTEK S.p.A respects

- The requirements of all regulations relating to corporate, legal, administrative, financial, fiscal aspects as documented in the Corporate Administrative Offices.

To the extent applicable, the documentation is reviewed and examined by the current **trade union college** and by the Legal Review **Board** appointed by **INTEK S.p.A.**

2 DATA CORRECTNESS AND TRANSPARENCY, CORRUPTION AND ANTI-COLLUSIVE BEHAVIOUR

The company **INTEK S.p.A.**, in every aspect of its global management, acts and operates to assure data correctness and transparency and/or non-implementation of illegal activities, particularly:

- compliance with the current technical and regulatory requirements in every activity and service

- o carried out with the best technical quality in the execution of each individual task
- o integrity, impartiality, independence of judgment of the work of each operating sector and in the drafting of the Test Reports
- o discordant personal interest interfering with individual activities on the part of all the personnel
- o conflicts of interest
- o interfacing with the Public Administration for any contracts, concessions, licenses and authorization or obtaining special preferential treatment
- o false production of documents to P.A.
- o alteration of computer records
- o missing or false allocation of funding obtained
- o respect for individual personality
- o absence of corporate offences such as false corporate communications, false corporate communications to the detriment of the company, associates or creditors, false prospectus
- o availability and collaboration for control activities by the College of Trade Unions or Members
- o illicit influence on the Shareholders
- o receipt, recycling and use of funds, goods, or utilities of illicit origin
- o fraudulent economic relationships with clients

3 STAFF TREATMENT

3.1 RESPECT FOR THE NATIONAL COLLECTIVE LABOR CONTRACT

All conditions prescribed by the National Collective Employment Agreement are fully respected and implemented in the relationship with personnel for job assignment, working hours, salaries and related deadlines, holidays, paid leave and/or any other constraint required and imposed by the reference **CCNL**.

3.2 NON-DISCRIMINATION FOR RECRUITMENT AND/OR TREATMENT OF STAFF

There is no discrimination in the recruitment of staff by gender, nationality, religion, race, politics, and/or any other diversity. Recruitment is solely carried out according to the technical and professional requirements necessary on a case-by-case basis without favoritism.

The **Employer/General Directorate** maintain constant control to ensure that particular situations relating to the following do not arise:

- o crimes against personality and individual inviolability
- o mobbing or stalking
- o difficulties of collaboration among employees

4 SAFETY AND HEALTH AT WORK AND FOR WORKERS, WORKPLACES

All **INTEK S.p.A.** staff comply with Italian Legislation and/or Community Workplace and Workplace Health Directives in every service or operation and adopts, whenever applicable and possible, the following principles and criteria:

- o avoiding risks
- o assessing unavoidable risks
- o combatting risks at their source
- o adapting work to employees, particularly in the concept of workstations and the choice of equipment and work methods with the intent of alleviating monotonous and repetitive labor to reduce their effect on employees' wellbeing
- o keeping track of the degree of technical evolution
- o replacing hazards with what is not hazardous or is less hazardous
- o programming prevention, aiming for a coherent system which integrates technique, labor organization and conditions, social relationships, and their influence on the work environment
- o prioritizing collective over individual protection measures
- o issuing appropriate instructions to employees

These principles are implemented in order to provide the necessary safety and health measures including occupational risk prevention, information and training, as well as setting up of an organization and necessary means for the employees or other persons who may be present at **INTEK S.p.A.**

5 GDPR REGULATION 2016/679 / GDPR 2016/679 REGULATION

The **EU GDPR Regulation 2016/679** recognizes that the personal data of a natural individual is an asset owned by the individual in question and as such, possesses economic value, whose management must be guaranteed.

INTEK S.p.A. 2016/679 GDPR Management System ensures that, in any activity or service, all **INTEK S.p.A. staff** and/or external entities that cooperate with **INTEK S.p.A.** comply with the requirements of the **EU Regulation** which define the methods and responsibilities through which personal data processed by **INTEK S.p.A.** is managed.

INTEK S.p.A. GDPR includes all the procedures currently implemented or underway necessary to ensure data security and avoid the risks which the Regulation warns against, specifically:

- o Vision of Data
- o Modification
- o Cancellation
- o Communication
- o Diffusion

To comply with the above conditions, **INTEK S.p.A.** has drafted procedures, registration documentation as well as assigning accountability for:

- o Identifying the categories of personal data processed, divided by area, and the data handling process
- o Identifying the figures responsible for the data handling
- o Defining the purpose of handling
- o Defining the processing register
- o Defining the procedures used to guarantee the rights defined by art.15-21 GDPR
- o Defining consent collection procedures
- o Defining procedures for locating and analyzing data breaches
- o Defining emergency procedures
- o Checking the degree of security of the processed data
- o Revising the policy related to each identified objective

6 INDEPENDENCE, IMPARTIALITY, AND INTEGRITY

6.1 INDEPENDENCE, IMPARTIALITY, AND INTEGRITY OF INTEK S.P.A. SHAREHOLDERS AND/OR ADMINISTRATIVE BODIES

In order to eliminate any possible doubt and to emphasize the total independence and absence of any conflict of interest of **INTEK S.p.A.** from any factor of undue commercial or financial pressure, interference or influence, the current and future corporate bodies, shareholders and the member companies, either individually or during the Shareholders' meeting or through members of the Board of Directors, the Trade Union College or through direct contact with staff, may not request to be informed or to interfere with the procedural and operational technical activity of **INTEK S.p.A.** carried out for individual clients, nor can they maintain informal relationships or agreements with **INTEK S.p.A. and its staff** or any other relationship aimed at being informed, interfering or influencing the outcome of technical activities and objectives in the testing reports of the individual activities of **INTEK S.p.A.** for its clients and their data confidentiality.

6.2 INDEPENDENCE, IMPARTIALITY, AND INTEGRITY OF INTEK S.P.A. STAFF

It is the responsibility of the **CEO/General Directorate** to put in place every precaution to ensure the absolute independence of staff judgment, preventing any incentive related to test results or other pressure in merit or other illicit activity as described in the preceding paragraph.

None of **INTEK** staff have connections or interests that may come into conflict with these principles and undermine trust in competence, impartiality, judgment, or professional integrity.

The remuneration of the **CEO/Employer/General Directorate, Division Directorate** and any **INTEK S.p.A.** personnel is established in terms of responsibility and professional technical ability, and is not commensurate or dependent upon the number of tests/assessments performed or the results of such

activities.

7 Confidentiality

All **INTEK** personnel respect the professional “code of ethics” concerning confidentiality regarding all information collected during the performance of its tasks and annually endorses a specific document that outlines the commitment to data confidentiality and secrecy. The document also notes that the commitment made has extended validity beyond the termination of collaboration with **INTEK S.p.A...**

To protect industrial ownership and confidentiality of information both during testing and in the preservation of **documents** **INTEK** adopts the following procedures:

- access to test areas and to the data relating to tests and clients is limited to authorized personnel. The eventual presence of the client in the Laboratory is directly supervised by the technicians so that the client is accompanied at all times and is not allowed access to areas in which tests on extraneous products are being carried out.
- The test samples are identified in such a way as to ensure, whenever possible, client confidentiality.
- The handling of test reports and documents received by the client is such that their review by third parties or externals to **INTEK** is impossible.
- confidentiality in the electronic retention and transmission of test results and data is guaranteed.

8 PROCEDURES IN THE EVENT OF CONFLICT OF INTEREST

To avoid any activity that may generate conflict of interest, **the CEO/Employer/General Directorate, Division Manager, Sector Managers and INTEK S.p.A.** personnel do not directly perform or intervene in the planning, production or construction, in the marketing, installation, use or maintenance of electric, electronic or mechanic devices of any kind nor do they represent persons engaged in these activities.

This, however, does not preclude the use of products undergoing testing, measurement or compliance assessments that are necessary to installation or to equipment necessary for laboratory testing.

9 ACKNOWLEDGMENT OF ACTIONS CONTRARY TO THE CODE OF ETHICS

In order to guarantee and comply with all the above, the **INTEK S.p.A. Board of Directors** requires that employees, associates, clients or third parties who are aware of any violation to the ethical requisites indicated in the preceding paragraphs, must report, in writing, such knowledge to the **CEO/General Directorate of INTEK S.p.A.**, who shall then convene the Board of Directors to investigate, deliberate and take appropriate action.

**MANAGING Director/General Directorate
INTEK S.p.A.**

Alberto Amistani

