



CODE OF ETHICS

Version	Date of approval	Approver
1	29 th October 2021	BoD



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Introduction

Aglatech 14 S.p.A. (hereinafter also 'the Company') considers loyalty, fairness, transparency, honesty and integrity as guiding principles for its activities and in the conduct of its business. The company embodies these principles in its customer focus, passion, pride and integrity in teamwork and in the constant search for innovation.

The purpose of this Code of Ethics is to define and formalise the ethical values in which the Company recognises itself, so that these values constitute the basic element of the corporate culture, as well as the standard of conduct of anyone operating in the interest or to the advantage of the Company itself.

This document constitutes a fundamental element of the Organisation and Management Model pursuant to Italian Legislative Decree No. 231/2001 adopted by the Company.

1. Recipients

This Code of Ethics, approved by the Board of Directors of Aglatech 14 S.p.A., formalises the behavioural principles and ethical values to which all those who work in the interest or to the advantage of the Company (hereinafter also referred to as the "Recipients") must adhere when performing the tasks and functions entrusted to them.

This Code indicates the conduct to be observed and the conduct that is forbidden, therefore the principles it establishes also have the value of reference standards, when an activity, act or operation is not regulated by procedures, policies or operating instructions.

2. Ethical Principles

3.1 Principle of legality

Aglatech 14 S.p.A. considers legality as an inalienable prerequisite for the achievement of its economic and social objectives and therefore undertakes to operate in compliance with national and international regulations and to ensure that business is conducted in accordance with the current legislation.

In particular, the Recipients should:

- observe and respect the rules of the legal system in which they operate;
- refrain from violating national and international laws and regulations;



- ensure, also by means of training, the necessary knowledge of the national and international laws applicable to the performance of their functions, as in force at the time, and conform their conduct to them.

In no way may the conviction of acting to the advantage or in the interest of the Company justify, not even in part, the adoption of conducts in conflict with national and international regulatory provisions and with the principles referred to in the Code of Ethics.

3.2 Professional Diligence

The conduct of each Recipient significantly determines the quality and efficiency of the organisation and the reputation of Aglatech 14 S.p.A., therefore the Recipients are required to perform their duties with diligence.

3.3 Integrity and independence

The Recipients, in the performance of their duties, must observe the duties of probity, dignity and independence.

To this end, they are required:

- not to willingly alter the source text for ideological reasons or personal opinions;
- to maintain their independence.

3.4 Attention to quality

Aglatech 14 S.p.A. aims to offer high-quality language services, enabling the development and growth of its customers.

To this end, the Company undertakes to accept only assignments in the languages and specialisations for which it is qualified and competent.

3.5 Dignity, equality and integrity

Aglatech 14 S.p.A. is committed to being a Company where fairness, honesty, equity and impartiality of behaviour, inside and outside the company, are a common way of feeling and acting. Sharing these principles makes it possible to establish lasting relations with Customers, Vendors and the Public Administration, guarantees general transparency in relations with third parties and ensures that the work of the staff is properly and fairly recognised.



Aglatech 14 S.p.A. is committed to respecting human rights by avoiding any discrimination on the basis of age, gender, sexual orientation, state of health, ethnic-cultural and geographical origin, public opinion, trade union membership and religion.

Aglatech 14 S.p.A. ensures respect for the physical and cultural integrity of the individual and promotes the enhancement of human resources in order to increase the quality of skills and the free sharing of opinions.

Aglatech 14 S.p.A. encourages diversity, as a vehicle for unique perspectives and exclusive personal contributions; curiosity, as a vehicle for open-mindedness; and creativity, as a resource for meeting challenges.

All Recipients must recognise and respect the personal dignity, privacy and personality rights of any individual and conduct themselves with transparency and moral integrity, as well as prioritising the values of honesty, fairness and good faith.

The Company will not tolerate any of the following conduct:

- engaging in rude, insulting and/or violent behaviour towards colleagues and/or one's manager;
- carry out one's activities in disregard of personality rights, moral integrity and the principles set out in this Code.

3.6 Conflicts of Interest

Aglatech 14 S.p.A. undertakes to implement all necessary measures to prevent conflict of interest situations.

Recipients, in the performance of their duties, are requested to avoid as far as possible situations that may generate conflicts of interest, even only potential ones, or that may interfere with their ability to make impartial decisions.

Should the Recipients find themselves in a condition of conflict of interest, they must promptly inform their hierarchical superior and refrain from taking decisions.

Any situation that may constitute or give rise to a conflict of interest or in any case impair the Recipient's ability to take decisions in the best interests of the Company determines the obligation to refrain from performing the acts connected with or relating to such situation, as well as the need



to inform one's hierarchical superior and the Supervisory Board in the manner indicated by the Organisation, Management and Control Model.

Finally, it should be noted that the translator has a duty to promptly make known to the client and, where appropriate, to the recipients of the service, any reasons for conflicts of interest of a personal, economic, ideological or similar nature, such as to compromise the quality and objectivity of the service.

3.7 Confidentiality

The staff of Aglatech 14 S.p.A. undertakes to treat all information obtained in connection with the performance of its work as confidential and therefore not to disclose it, except to the extent necessary for the proper conduct of its business or to comply with legal obligations or requests by the Authorities.

Personal, sensitive and confidential information of the Company and third parties must be treated in accordance with the provisions of national and supranational privacy legislation.

For this reason, the Company undertakes to:

- carefully guard information and any documents that come into its possession or otherwise become available to it in the course of its relationship with third parties;
- use such information wisely, avoiding that its inappropriate disclosure may harm third parties or any other parties involved;
- not to use such information for corporate advantage.

Information, knowledge and data acquired or processed during their work or through their duties, by Aglatech 14 S.p.A. personnel, belong to the Company and may not be used, communicated or disclosed without a specific authorisation. The duty of confidentiality does not end with the conclusion of the service or the professional relationship.

4. Declination of ethical principles

The Company is aware of the importance of a serene and quality working environment not only for the achievement of corporate objectives but above all for the psycho-physical well-being of its staff. For this reason, it is committed to fostering a harmonious climate, marked by dialogue, confrontation among employees and respect for personal opinions.



Aglatech 14 S.p.A. undertakes to:

- ensure compliance with current labour legislation with particular attention to health and safety in the workplace;
- provide suitable environments and tools for carrying out work activities;
- select resources that share the same values and possess the requirements, professionalism and characteristics appropriate to the role required;
- provide adequate support and training, based on the professional needs required by the role;
- communicate its objectives transparently;
- promote the participation and involvement of employees in the management of the organisation and its programmes, recognising their fundamental role in the development of its programmes;
- acknowledge the commitment and professionalism of its collaborators, through evaluation and professional growth paths, without any discrimination;
- recognise, in compliance with collective agreements and internal regulations, economic compensation commensurate with the levels of responsibility and professionalism in the various corporate roles;
- encourage spaces for discussion and dialogue, open to all the company's resources, considering confrontation a constructive and functional tool for the pursuit of a collaborative climate and the effective and efficient management of the company's activities.

4.1 Personnel Management

Selection, recruitment and development of human resources

Personnel selection, recruitment and management activities are conducted in compliance with the applicable legislation, the principles of this Code of Ethics of equal opportunities and without any discrimination. The selection is made by objectively assessing the personal and professional characteristics of the candidates and their suitability for the context in which they will be placed, thus excluding any favouritism, facilitation or recommendation.

In the field of human resources development, Aglatech 14 S.p.A. is committed to creating and maintaining the necessary conditions so that the skills, competences, knowledge of each employee can further expand and evolve in harmony with personal aptitudes, in order to ensure the effective achievement of the Company's objectives. For this reason, the Company ensures that merits are recognised, while respecting equal opportunities.



No form of irregular employment is allowed: all Company Personnel are hired with a regular employment contract and the relationship is conducted in full compliance with the collective bargaining regulations of the sector they belong to, with tax, social security and insurance regulations, and with immigration provisions. Labour relations are formalised by means of regular contracts, rejecting any form of irregular work, also with regard to the permanence of foreign nationals in the territory of the State.

Workers' health and safety

The Company favours working conditions that protect people's psycho-physical integrity by providing workplaces that comply with current health and safety regulations.

In this regard, the Company undertakes to:

- avoid risks;
- assess risks that cannot be avoided;
- combat risks at source;
- adapt work to people, particularly with regard to the design of workplaces and the choice of work equipment and working and production methods, in particular in order to reduce the effects of work on health;
- replace what is dangerous with what is not dangerous or is less dangerous;
- plan prevention, aiming for a coherent complex that integrates technology, work organisation, working conditions, social relations and the influence of factors in the working environment;
- give appropriate instructions to workers.

4.2 Environment

Aglatech 14 S.p.A. recognises the protection of the environment as a primary value in the operation of the company, starting from the management of daily activities up to strategic choices. Investment and business decisions are informed as concerns respect for the environment and the legislation protecting it. In particular, the Company has adopted a *zero-waste* policy, aimed at fostering:

- the optimisation of waste and/or consumption in order to reduce the impact on the environment;



- the introduction of low-impact business equipment that limits plastic abuse;
- ways of managing documentation in electronic format, in order to limit the use of paper.

4.3 Protection of corporate assets and copyright-protected works

Under no circumstances may corporate assets be used for purposes contrary to the law, public order or morality, or to commit or induce the commission of offences. It is also forbidden to engage in conduct that may damage, alter, deteriorate or destroy computer systems, programmes and data of the Company or of third parties, as well as to transfer corporate assets to third parties.

Personnel must also refrain from using copyrighted works for which Aglatech 14 does not have the necessary licences and authorisations. It is also prohibited to reproduce, sell works developed or purchased by the Company.

Personnel must diligently preserve the company assets entrusted to them for the performance of their work, preventing unauthorised third parties from using them.

4.4 Cyber Security

Aglatech 14 is aware of the paramount role that the ICT infrastructure plays in its business. The Company is therefore fully aware of the importance of having an effective, efficient and secure ICT infrastructure, such as to guarantee the confidentiality, security and integrity of the multitude of data that are managed on a daily basis.

Personnel are, therefore, required to use their company laptops and mobile phones (where provided) with the utmost diligence, guarding them and avoiding leaving them unattended and/or easily accessible, as well as equipping them with passwords developed with state-of-the-art security criteria and periodically updated.

4.5 Relations with the Public Administration and Authorities

Relations with the Public Administration and the Authorities are based on principles of fairness, transparency and cooperation and, therefore, all behaviour of a corruptive, collusive, vexatious nature or likely to undermine the principles expressed in this Code is prohibited.

The assumption of commitments towards the Public Administration is reserved exclusively to the appointed and authorised corporate functions, in compliance with the strictest observance of the provisions of the law and the system of delegated and proxy powers in force.



Any action that may impair the autonomy and impartiality of judgement of representatives of the Public Administration and the Judicial Authority is prohibited.

The Company demands the utmost availability and cooperation from its Personnel towards representatives of the Judicial Authority, the Police Force and those with powers of inspection and control (Authorities in general).

In the course of inspection activities, the Recipients are required to comply promptly with any request from public institutions or competent authorities and are prohibited from making, inducing or encouraging false statements.

4.6 Management of contributions, financing, grants and other public funds

Aglatech 14 requires that the management of contributions, financing, grants and public funds in general is carried out with the utmost respect for the principles of transparency, fairness, correctness and traceability.

Aglatech 14 checks that the declarations and documents submitted to obtain public funds are complete, truthful, represent the true economic, asset and financial situation of the Company and are authorised and signed in advance in accordance with the provisions of the proxy and power of attorney system in force.

The company also undertakes to constantly monitor the process of managing public funds and, in particular, their use for the purposes for which they were requested and obtained.

4.7 Management of sponsorships and donations

Aglatech 14 is committed to ensuring that free gifts, sponsorships, donations take place in compliance with the principles of fairness and propriety and are properly authorised, formalised, accounted for and traceable.

With regard to sponsorships, Aglatech 14 undertakes to verify the actual execution of the sponsorship contract in order to assess that the money has been used for the purposes set out in the sponsorship contract and in compliance with its clauses.



4.8 Relations with Control Functions and Certifying Bodies

Aglatech 14 undertakes to actively cooperate with the control functions and certifying bodies and to disseminate a corporate culture accordingly.

The Company opposes any conduct aimed at obstructing the performance of the activities of the control functions and certifying bodies.

4.9 Customer Relations

Aglatech 14 behaves towards its customers with integrity, trust, independence, availability, competence, respect and courtesy, with a view to a collaborative and highly professional relationship.

All Recipients undertake to operate in such a way as to meet customers' expectations to the best of their ability and to relate to them with courtesy, openness and respect.

In establishing business relations with new customers and in managing existing ones, the Recipients must avoid having relations with persons implicated in unlawful activities or, in any case, lacking the necessary requisites of ethicality and commercial reliability.

4.10 Relations with Vendors

Aglatech 14 S.p.A. seeks out Vendors that offer the highest guarantees in terms of fairness and ethics and contractually requires them to comply with the law, to be aware of and adhere to the principles established in this Code. The company promotes building lasting relationships for the progressive improvement of performance, always considering the protection and promotion of the principles and contents of the Code. Aglatech 14 S.p.A. refrains from entering into any form of collaboration with anyone who does not accept these conditions and contractually reserves the right to take all appropriate measures in the event that the vendor violates the rules laid down by law or this Code.

The selection of vendors of goods or services and, in any case, the purchase of goods and services of any kind are carried out by the appropriate functions delegated to this task, on the basis of objective and documentable criteria, marked by the search for the best balance between economic advantage and quality of service.

In particular, Company employees assigned to these processes are required to



- not preclude any vendor meeting the requirements from competing in the awarding of tenders, adopting objective and documentable criteria in the selection of the shortlist of candidates;
- verify in advance the information available on Vendors in order to ascertain their respectability and the legitimacy of their activities;
- demand the application of the contractual terms and conditions;
- require vendors to adhere to the principles of Model 231 and make them aware of this Code and of the expectation that the collaboration with them will be inspired by the same ethical principles, operate within the framework of the regulations in force and require their punctual compliance;
- bring any relevant problems that have arisen with a vendor to the attention of the competent structure, so that the consequences can be assessed.

In order to ensure maximum transparency and efficiency of the purchasing process, the Company provides for:

- the separation of roles between the function requesting the supply and the one concluding the contract;
- adequate traceability of the choices made through the retention of information relating to candidates as well as contractual documents for the periods laid down by the regulations in force and referred to in internal procurement procedures.

4.11 Accounting and Budget Management

Aglatech 14 is aware of the importance of transparency, accuracy and completeness of accounting information and strives to set up and constantly improve an administrative and accounting system that is reliable in correctly representing management facts and in providing the tools to identify, prevent and, as far as possible, manage financial and operational risks.

Aglatech 14 S.p.A. provides, in the financial statements and other accounting and tax documents required by current legislation, a true and fair view of the company.

The accounting records and the documents generated by them must be based on accurate, timely and verifiable information, must reflect the nature of the transaction to which they refer, and must comply with legal constraints and proper accounting principles. They must also be accompanied by the supporting documentation necessary to allow objective analysis and verification.



Adequate documentation must be kept in support of each operation, in accordance with the provisions of the applicable legislation, to enable the accounting records, the reconstruction of the operation and the identification of any responsibilities.

4.12 Information Management

Aglatech 14 ensures truthful, clear, transparent and accurate information to stakeholders. To this end, the Company is aware of how internal and external communication is a cornerstone and instrumental to the efficiency of its business.

Inward and outward information should be based on the principles of fairness, correctness, legality, transparency and aimed at providing information that corresponds to the truth.

It is absolutely forbidden to disseminate news or any false or fraudulent documentation, or to engage in simulated transactions or other artifices likely to mislead stakeholders, the Authorities and the Public Administration.

It is also expressly forbidden for anyone to divulge confidential information concerning projects, intellectual works held by the Company for the performance of its activities, as well as negotiations, initiatives, agreements, commitments, even if future and uncertain, concerning the Company that are not in the public domain.

5. Fighting crime

Corruption

Any form of corruption, exchange of illegitimate favours, collusive behaviour, direct or indirect solicitation of personal or career advantages for oneself or others is strictly prohibited.

It is never allowed to pay or offer, directly or indirectly, payments, material benefits and/or other advantages of any kind to third parties or to Public Officials, Persons in Charge of a Public Service or public or private employees, in order to influence or compensate them for an act of their office. Acts of commercial courtesy, such as gifts or forms of hospitality, are permitted only if they are of modest value, not likely to compromise the integrity or reputation of either party, or likely to be interpreted by an impartial observer as aimed at acquiring improper advantages.

The acceptance of money, other benefits or advantages by third parties wishing to enter into business relations with Aglatech 14 S.p.A. is prohibited. Anyone who receives proposals for gifts or



favourable treatment or hospitality that do not constitute acts of commercial courtesy of modest value shall reject them and immediately inform the Supervisory Board.

Receiving stolen goods, money laundering and self laundering

Aglatech 14 S.p.A. conducts its business in full compliance with current legislation on receiving stolen goods, money laundering and self-laundering and undertakes to act in such a way that the Company and its staff cannot be involved in suspicious transactions in terms of fairness and transparency.

In particular, the Company undertakes:

- to verify in advance the information available on business counterparties, suppliers, distributors, business partners, collaborators and consultants, in order to ascertain their respectability and the legitimacy of their activities before establishing business relations with them;
- not to receive payments in cash, above the thresholds laid down by current anti-money laundering legislation, by means of bearer securities or through unauthorised intermediaries or through the intermediary of third parties that make it impossible to identify the payer;
- not to carry out transactions that prevent the reconstruction of the financial flow;
- to avoid any involvement in operations that could, even potentially, favour the laundering of money from illegal or criminal activities, acting in full compliance with anti-money laundering legislation.

In the event of evidence of any transactions resulting from unlawful dealings or activities that could constitute the commission of an offence, without prejudice to the appropriate reports to the Supervisory Board and the competent Authorities, the Recipients are required to undertake not to use, substitute, transfer in economic, financial, entrepreneurial or speculative activities, the money, goods and other utilities resulting from the commission of such offences.



Criminal association

Aglatech 14 S.p.A. refrains from any kind of relationship, even if indirect or through intermediaries, with persons (natural or legal persons) who are known or are reasonably suspected to be part of or support in any form whatsoever criminal organisations of any kind, including mafia-type organisations, organisations dedicated to human trafficking or exploitation of child labour, as well as persons or groups operating for the purposes of terrorism.

6. Training and information

Aglatech 14 S.p.A. undertakes to promote training and information activities regarding the content of this Code of Ethics.

7. Violations

Aglatech 14 S.p.A. is actively committed to preventing, interrupting and sanctioning violations of the Code of Ethics in accordance with the provisions of the Organisation, Management and Control Model.