

CODE of CONDUCT

Tecmea wants to enforce its Code of Conduct in order to emphasize ethical principles driving Tecmea's relationship with its clients, employees and external partners.

This Code of Conduct binds all Directors of Tecmea as well as all its employees.

Tecmea requests its Suppliers and its external Partners to abide to principles of this Code of Conduct.

Tecmea aims to be recognized as Partner of Mechanical industries facing technical and manufacturing challenges, to provide solutions and becoming part of its Customers' technological achievements.

Tecmea endeavours to achieve its ambition by implementing its founding **Values: Reliability, Respect, Experience and Innovation.**

Reliability

for our commitments and our products, achieved thanks to a well-tested system including our employees, suppliers and technologies, organised by work processes, enabling to be effective, reactive and flexible, a **sound Partner** throughout the entire life-cycle of product engineering, producing and operating.

Tecmea is committed to always act **in compliance with Laws and Regulations** of the Country in which it operates and secondarily in line with its own ethical Principles.

Its Directors and Employees will not act, and will not be involved, in anyway which can imply **laundering money** deriving from illegal actions. All incomes must match relevant registered commercial activity and must be clear and easy to track. Whomever transfers money to and from the Company must be identified.

Tecmea does not tolerate any type of **bribery** and its Directors, Employees and Representatives cannot, directly nor indirectly, accept, request, offer or pay any sum of money or any other benefit (including gifts unless of limited value).

Tecmea assures an accurate and transparent **accounting**, compliant to the law of Italy, and is committed to share exhaustive financial reports with shareholders, commercial and financial partners which may demand them.

Tecmea is committed to protect its **know-how** and intellectual property as well as those of its partners and suppliers. Every decision and behaviour within the Company must be taken for the benefit of Tecmea and its clients, preventing any **conflict of interest**.

Directors and employees are due to report to their superior and to Head of Human Resources any situation of conflict of interest; every employee must inform his/her manager in case he/she has any direct or indirect interest or participation in another company and in case of any commercial, professional, family or friendly relationship with entities or people having business with Tecmea or with its suppliers or clients.

Respect

towards our client, listening to him, understanding his needs and delivering a prompt, effective and reliable solution.

Tecmea guarantees the absolute **confidentiality** of any information about clients, their projects and products, and is committed to provide the highest security level while selecting and utilising its IT systems to store and treat personal data and confidential information.

Tecmea appreciates the value of free **competition** for the benefit of its clients and is committed to fully respect rules of law about competition applicable in the area of its activity. The Company, its Directors and Employees do not act in violation of Competition law and will not deliberately violate third party intellectual rights.

Respect

towards our employees, involving them to create solutions and improvements, valuing their contribution within TECMEA Family.

Tecmea is committed to offer **equal opportunity** for job and career to every individual, irrespective of his/her race, genre, sexual orientation, social position, physical condition, age, nationality, religion and personal belief.

Directors must guarantee that employees, under every aspect of labour relationship, be treated exclusively on the

base of their capacity to satisfy relevant job requirements.

Tecmea is committed to provide a decent and cooperative **work environment**, where health, dignity and integrity of each individual are properly respected. Directors are committed to take every decision respecting workplace health and safety, adopting all individual and collective preventive actions to minimize potential risks.

Directors and employees are individually responsible for workplace safety and must not expose themselves nor other employees to risks of harming themselves, and they cannot work under the effect of alcohol or drugs.

Respect

towards our suppliers, helping them to develop, acknowledging their value with a true spirit of long-term partnership.

Tecmea wishes to assure a **fair and lasting relationship** with its suppliers, then it commits its Directors and Employees to recognise supplier's experience, competence, and contribution to Tecmea achievements with full honesty and fairness.

Tecmea is committed to protect its suppliers' **know-how** and intellectual property, and is committed to provide the highest security level while selecting and utilising its IT systems to store and treat personal data and confidential information.

Tecmea encourages its suppliers to adopt its **Code of Conduct** and is committed to diffuse its principles and contents, acting to clarify all doubts and to contribute to its implementation.

Experience and innovation

resulting from our history and from our team of experienced employees, eager to deliver perfect and competitive Products and a range of Services of excellence.

Tecmea is committed to manufacture products delivering the economical and performance level expected by clients, in full respect of legal requirements and compliant with highest environmental and safety standard.

To this purpose, Tecmea endeavours to develop and implement innovative technical solutions which also secure the minimum possible environmental impact during manufacturing and recycling phases.

In order to get the best distribution and respect of this Code of Conduct, Tecmea commits:

- to distribute it and any further amendment to every employee, supplier and external partner, providing its support to clarify any doubt
- to monitor its implementation and respect under all forms and behaviours, suggesting possible amendments
- to guarantee that no retaliation under any form be addressed to those who have informed about Code of Conduct violation
- in case of violation, to apply just and commensurate warnings and, if necessary, sanctions to Directors and Employees impartially
- to terminate the cooperation, in case of serious violation made by the supplier or by the external partner.

Tecmea Code of Conduct is diffused by means of a printed document distributed to all Directors, Employees, Suppliers and external Partners; by means of website www.tecmea.it; by means of a poster, signed by the CEO, posted in the Offices and Workshops.

Modena, October 2017

Giorgio Geom. Cassiani

