



# CODE OF ETHICS

*This Code of Ethics has been approved by the Board of Directors of TRB srl*

# Contents

|   |  |   |
|---|--|---|
|   | THE TRB SRL VISION.....  | 3 |
|   | SCOPE AND RECIPIENTS.....  | 3 |
| 1 | GENERAL PRINCIPLES .....   | 4 |
|   | 1.1 Legality.....  | 4 |
|   | 1.2 Fairness .....   | 4 |
|   | 1.3 Non-discrimination.....                                      | 4 |
|   | 1.4 Confidentiality.....   | 4 |
|   | 1.5 Diligence .....  | 5 |
|   | 1.6 Loyalty.....   | 5 |
| 2 | RELATIONS WITH EMPLOYEES AND CONSULTANTS.....                    | 5 |
|   | 2.1 Personnel selection .....                                    | 5 |
|   | 2.2 Personnel management .....                                   | 5 |
| 3 | WORKING ENVIRONMENT.....   | 6 |
| 4 | BUSINESS MANAGEMENT .....  | 6 |
|   | 4.1 Compliance with internal procedures.....                     | 6 |
|   | 4.2 Accounting management.....                                   | 6 |
|   | 4.3 Protection of assets.....                                    | 7 |
|   | 4.4 Communication .....  | 7 |
| 5 | EXTERNAL RELATIONS .....   | 7 |
|   | 5.1 Relations with Authorities and Public Sector Bodies.....     | 7 |
|   | 5.2 Relations with political organisations and trade unions..... | 7 |
|   | 5.3 Customer and supplier relations .....                        | 8 |
| 6 | INTERNAL CONTROL SYSTEM.....                                     | 8 |
| 7 | DISCIPLINARY ACTION GUIDELINES.....                              | 8 |

## INTRODUCTION

### ***THE TRB SRL VISION***

TRB srl is aware that a company's reputation is reflected not only in the competence of its employees and the high quality of the service provided to customers, but also by the attention paid to the needs of the entire community.

The principles that have always guided the Company's business are formally outlined in a Code of Ethics and Conduct, based on the belief that reliability is built on a daily basis by respecting standards and valuing people.

This Code of Ethics represents a distinctive and recognisable benchmark in relation to the market and third parties. The understanding of and adherence to this document, required by all those who work for the Company or collaborate with it, form the bedrock of our activities and the first step towards achieving our corporate vision.

TRB srl's objective is therefore to pursue excellence in the market it operates in through Sustainable Development, safeguarding the Environment and the Safety of the people involved through consistent conduct that respects Social Ethics, delivering satisfaction and ensuring added value for employees, for customers and for the community as a whole.

### ***SCOPE AND RECIPIENTS***

This Code of Ethics (hereinafter, the "**Code**") outlines the set of ethical and moral principles that underpin the activities of TRB srl (hereinafter, the "Company") as well as the rules of conduct adopted by the Company both internally (in relations between employees) and externally (in relations with institutions, suppliers, customers, business partners, political and trade union organisations, and the media) (hereinafter, the "**Stakeholders**").

Respect for these principles is of fundamental importance to achieve TRB srl's corporate mission and to guarantee its reputation in the social-economic context in which it operates.

First and foremost, TRB srl strongly believes that every activity must be carried out ethically, aligning with the principle enshrined in Article 41 of the Constitution, which states that private economic initiative "*shall not be carried out against the common good or in a way that may harm public security, liberty, and human dignity.*"

This Code is binding for TRB srl directors and employees, as well as for all those who work and collaborate on a permanent or temporary basis on behalf of the Company (hereinafter, the "Recipients").

The Code will be widely distributed within the internal governance structure, and broadly communicated externally, including through the company website.

TRB srl also commits to adopting any additional measures to ensure that the principles and provisions of the Code are effectively communicated and applied.

## **1 GENERAL PRINCIPLES**

The conduct of the Recipients, at all levels of the company, is guided by the principles of legality, fairness, non-discrimination, confidentiality, diligence and loyalty.

### **1.1 Legality**

TRB srl operates in full compliance with the law and this Code.

All Recipients are therefore required to comply with all applicable regulations and to constantly keep themselves abreast of legislative developments, also taking advantage of the training opportunities offered by TRB srl.

The Company considers transparency in financial statements and accounting a fundamental principle for the conduct of its business and for the protection of its reputation.

### **1.2 Fairness**

Fairness and moral integrity are a fundamental obligation for all Recipients.

Recipients are prohibited from establishing any privileged relationships with third parties resulting from external solicitations aimed at obtaining unfair advantages.

In the performance of their activities, Recipients must not accept donations, favours or benefits of any kind (except for items of modest value) and, in general, must not accept any consideration for the purpose of granting advantages to third parties in an improper manner.

In turn, Recipients must not make donations of money or goods to third parties or in any case offer unlawful benefits or favours of any kind (except for items of modest value or promotional gifts authorised by the Company) in connection with the activities they perform for the benefit of TRB srl.

The intrinsic belief of acting in the interests of the Company does not exempt Recipients from their obligation to strictly comply with the rules and principles of this Code.

### **1.3 Non-discrimination**

In its relations with Stakeholders, particularly in the selection and management of staff, work organisation, the choice, selection and management of suppliers, as well as in its relations with bodies and institutions, TRB srl shall avoid and reject any discrimination on the basis of the age, sex, race, sexual orientation, state of health, political or trade union opinions, religion, culture and nationality of the people it deals with.

TRB srl shall, at the same time, foster integration by promoting intercultural dialogue and protecting the rights of minorities and the disadvantaged.

### **1.4 Confidentiality**

TRB srl is committed to ensuring the protection and confidentiality of the personal data of Recipients and Stakeholders, in compliance with all applicable data protection regulations.

Recipients are prohibited from using confidential information obtained in the course of their work for purposes unrelated to such activities, and in any case are required to always act in compliance with

the confidentiality obligations assumed by TRB srl towards all Stakeholders.

In particular, Recipients are bound by the strictest confidentiality in relation to documents disclosing know-how, logistics information, business information and corporate transactions.

### **1.5 Diligence**

The relationship between TRB srl and its employees is based on mutual trust. Employees are, therefore, required to work in the interests of the Company, in compliance with the values set out in this Code.

Recipients must refrain from any activities that may conflict with the interests of TRB srl, refraining from pursuing personal interests that conflict with the legitimate interests of the Company.

In cases where a potential conflict of interest may arise, Recipients are required to inform their line manager without delay so that the company can assess, and potentially authorise, the activity that could give rise to a conflict.

In cases of violation, the Company will take all appropriate measures to resolve the conflict of interest, reserving the right to act in its own defence.

### **1.6 Loyalty**

TRB srl and the Recipients are committed to fair competition, in compliance with national and EU regulations, recognising that constructive competition is a healthy incentive for innovation and development processes, while also protecting the interests of consumers and the community.

## **2 RELATIONS WITH EMPLOYEES AND CONSULTANTS**

### **2.1 Personnel selection**

Personnel evaluation and selection is carried out fairly and transparently, respecting equal opportunities in order to match TRB srl's needs with the professional profiles, ambitions and expectations of the candidates.

TRB srl undertakes to adopt all appropriate measures to avoid any form of favouritism in its personnel selection process, using objective and merit-based criteria and respecting the dignity of candidates, all in the interests of the smooth running of the Company.

New hires, including through the implementation of this Code, shall receive clear and correct information about their roles, responsibilities, rights and obligations.

### **2.2 Personnel management**

TRB srl protects and values its human resources, undertaking to maintain the conditions necessary for the professional growth, knowledge and skills of each individual. It provides appropriate training for professional development and undertakes initiatives aimed at pursuing this goal.

TRB srl encourages employee engagement in the life of the company, providing a feedback mechanism to collect workers' opinions and suggestions, guaranteeing the broadest possible

participation.

While remaining fully committed to the Company, no worker will be obliged to perform tasks, services or favours that are not required under their employment contract or according to their role within the company.

The Company is firmly committed to combating bullying, harassment, psychological violence and any behaviour that is discriminatory or damaging to the dignity of individuals regardless of whether it occurs on or off company premises.

Relations between employees must be conducted with loyalty, fairness and mutual respect, in compliance with the values of peaceful coexistence and the freedom of individuals.

### **3 WORKING ENVIRONMENT**

TRB srl is committed to offering its staff a healthy, safe and dignified working environment.

Safety in the workplace is ensured both by strictly implementing the provisions of the law in force and by actively promoting a safety culture through specific training programmes. Staff training is a central element of the management system adopted.

TRB srl protects the health of its workers, also guaranteeing compliance with hygiene and health regulations.

### **4 BUSINESS MANAGEMENT**

#### ***4.1 Compliance with internal procedures***

TRB srl believes that management efficiency and a culture of supervision are indispensable elements for the achievement of its objectives.

Recipients are required to strictly comply with the company's internal procedures and instructions.

Recipients must act in accordance with their authorisation profiles and must keep all appropriate documentation so as to keep track of actions taken on behalf of the company.

#### ***4.2 Accounting management***

As part of their accounting management activities, Recipients are required to comply with the principles of truthfulness, accuracy and transparency in order to protect TRB srl's reputation both internally and externally.

Compliance with these principles also allows the company to plan its operational strategies according to its actual economic and asset situation.

All entries in the accounts must therefore be supported by complete, clear and valid documentation, without any form of omission, falsification and/or irregularity.

In the case of balance sheet or profit and loss items based on valuations and estimates, these must be recorded on the basis of the criteria of reasonableness and prudence.

### **4.3 Protection of assets**

Recipients shall perform their duties with a view to optimising and limiting the use of company resources.

Recipients are required to correctly apply security provisions in order to protect hardware devices from unauthorised access, which could seriously infringe the personal data protection rights of TRB srl staff and customers.

### **4.4 Communication**

TRB srl provides Stakeholders with appropriate communication tools through which they can interact with the company to send requests, ask for clarifications or submit complaints.

TRB srl promotes effective corporate communication that successfully puts the company in contact with society at large, enabling it to understand the community's expectations, needs and requirements, while sharing its values and mission.

The information shared with Stakeholders is complete and accurate so that the recipients can make correct and informed decisions.

TRB srl's advertising respects ethical values, safeguarding minors and rejecting inappropriate or offensive messages.

## **5 EXTERNAL RELATIONS**

### **5.1 Relations with Authorities and Public Sector Bodies**

Relations with authorities and public sector bodies must be based on the utmost clarity, transparency and cooperation, in full compliance with the law and according to the highest moral and professional standards.

Recipients shall not conduct relations with authorities and public sector bodies in the name and on behalf of TRB srl unless expressly authorised to do so.

In relations with public officials, public service representatives, and the public sector in general, authorised Recipients shall abide by the highest standards of fairness and integrity, refraining from any form of pressure, whether explicit or implicit, aimed at obtaining any unfair advantage for themselves or for TRB srl.

In this regard, authorised Recipients shall strictly comply with the provisions of this Code, as well as, more generally, with the directives issued by TRB srl management.

### **5.2 Relations with political organisations and trade unions**

TRB srl does not show favour towards or discriminate against any political organisation or trade union.

The Company shall not make any undue contribution in any form whatsoever to parties, trade unions or other social groups, except in the case of specific exceptions and in any case always within the

limits of what is permitted by the laws in force.

Recipients are required to refrain from any direct, indirect or overt pressure on political or trade union representatives.

### **5.3 Customer and supplier relations**

Recipients shall deal with third parties with courtesy, competence and professionalism, in the firm belief that the protection of the company's image and reputation and consequently the achievement of the company's objectives depend on their conduct.

In particular, Recipients must refrain from any form of dishonest or deceptive behaviour that could lead customers or suppliers to rely on unfounded facts or circumstances.

Recipients are expected to make constant efforts to offer prompt, high-quality services to customers, making every effort to minimise any form of disruption or delay in order to maximise customer satisfaction.

Relations with suppliers are based on loyalty, fairness and transparency.

Suppliers are chosen on the basis of objective criteria of cost-effectiveness, suitability and efficiency.

The choice of suppliers on purely subjective and personal grounds or, in any case, on the basis of interests that conflict with those of the company, is strictly forbidden.

Recipients must put in place every possible measure so that suppliers and customers are also able to comply with the fundamental ethical principles set out in this Code.

## **6 INTERNAL CONTROL SYSTEM**

Compliance with the provisions of this Code is entrusted to the prudent, reasonable and careful supervision of each of the Recipients, within the scope of their respective roles and functions within the company.

All Recipients are encouraged to report to their direct superiors any facts and circumstances potentially in conflict with the principles and provisions of this Code.

The TRB srl management team and the bodies appointed for this purpose shall take all necessary measures to address any violations, including the implementation of disciplinary measures in compliance with the law and workers' rights, including trade union rights.

## **7 DISCIPLINARY ACTION GUIDELINES**

The internal control system is designed to implement tools and methodologies to counter potential business risks, in order to ensure compliance not only with the law, but also with internal provisions and procedures.

Indeed, violation of the principles set out in the Code and in the procedures indicated in the internal controls undermines the relationship of trust between the Company and its directors, employees,



consultants, contractors in various capacities, customers, suppliers, and business and financial partners.

Such violations will therefore be immediately and decisively addressed by TRB srl through the adoption of appropriate and proportionate disciplinary measures.

The effects of violations of the Code of Ethics and internal protocols must be taken into account by all those who, in any capacity, interact with TRB srl. Depending on the seriousness of the conduct of the person involved in one of the unlawful activities envisaged by the Code, TRB srl shall promptly take the appropriate measures, independently of any criminal prosecution by the judicial authorities.

Without prejudice to the foregoing, conduct in violation of the Code of Ethics constitutes:

- serious misconduct for employees (blue-collar workers, white-collar workers, middle managers and executives), subject to disciplinary action depending on the severity of the breach, as set out in the applicable National Collective Labour Agreement. These measures may include verbal warnings, written warnings, fines not exceeding three hours' pay, suspension from work and pay up to a maximum of three working days, or dismissal for just cause or justified reason; if criminal proceedings are pending or if a measure restricting personal liberty is taken against the employee, before adopting the disciplinary measure, the sanction of suspension from work and pay may be adopted, for the duration corresponding to the outcome of the criminal proceedings or until the end of the measure restricting personal liberty;
- just cause for revocation of the directors' mandate;
- cause for immediate termination of the relationship, in the most serious cases, for external consultants and contingent workers;
- cause for immediate termination of the relationship, in the most serious cases, for suppliers, contractors and subcontractors.

The identification and application of disciplinary measures will always take into account the general principles of proportionality and appropriateness with respect to the alleged violation.

In all of the aforementioned scenarios, TRB srl also reserves the right to perform all the actions it deems appropriate to claim compensation for the damage suffered as a result of conduct in violation of the Code of Ethics.