

**CODE OF ETHICS  
AND CONDUCT**  
of



**Index of the revisions of the Code of Ethics and Conduct**

<b>REVISION</b>	<b>DATE</b>	<b>DESCRIPTION</b>
00	June 2020	First issue

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## 1. PURPOSE AND AREA OF APPLICATION

IMS Technologies is today an international point of reference for the design and production of technologically advanced industrial machinery in various sectors, such as Converting, Packaging and the Automotive sector.

The group is aware that ethics in business conduct is a necessary condition for success, representing one of the essential elements for the creation of value. For this reason, it has provided itself with a specific tool.

The present Code of Ethics and Conduct (hereinafter may be described as “Code”) applies to IMS Technologies S.p.A., to all its controlled companies in Italy and abroad (for these latter, within the limits of the applicable laws) (hereinafter may be described as “Group”) and its related Addressees, as defined below. For the purposes of this document, Company or IMS Technologies S.P.A. shall be deemed to mean any single Company to which the Code applies.

The Code defines and states the values and principles of conduct inspiring the Company’s activities and its relations with all subjects with which it entertains relationships for the pursuit of its corporate purpose. The Code of Ethics and Conduct shall be deemed an integral part of the Company’s Organization, Management and Control Model as envisaged by Law Decree 231/2001 concerning “Discipline of the administrative liability of legal persons”.

The rules of the Code and the Model not only apply in their entirety, without any exception, to all the Company staff; they must also be observed by the Addressees, as defined hereunder.

Shareholders, consultants and other external collaborators, customers, suppliers and all those who, in various guises, work for the pursuit of the Company’s goals, shall contribute, therefore, to the consolidation of a company image faithful to the values of transparency, correctness and loyalty.

Observance of the rules of the Code in its entirety shall be deemed an essential part of the contractual obligations of all staff (as of and to the effects of art. 2104 of the Italian Civil Code).

All those operating in the name of and/or on behalf of the Company and/or the Group in any way whatsoever, without distinctions or exceptions, are required to take note of the Company's adoption of the Code and to commit themselves to compliance with the values represented within, deeming this aspect of fundamental importance for maintaining the business relationship. Any breach by the aforesaid subjects of the principles envisaged in the Code will be evaluated, not least in order to protect the Company's rights and interests.

Application of this document is among the personal responsibilities of the Addressees of the Code. These latter, once informed, will not be able to cite, as justification for non-compliance, unawareness of the Code or the receipt of contrary instructions from any hierarchical level or contact person of the Company.

## **2. CODE OF ETHICS AND CONDUCT**

IMS Technologies S.p.A. has deemed it essential to adopt an Organization, Management and Control Model to the effects of Law Decree 231/2001, of which this Code is a part, in order to identify and indicate with clarity and transparency the values and principles that inspire the Company's activities.

It is deemed indispensable, in fact, for achievement of its corporate purpose, that all subjects operating within the Company and all those entertaining any form of relationship with this same, should comply with the rules of conduct that inspire the Company's work.

The Code shall guide the Company's daily entrepreneurial and operative action in its entirety, in the conviction that achievement of its corporate goals cannot be divorced from ethics and absolute compliance with legality in the conduct of corporate activities.

To avoid damage to the Company's image, good name, reputation and economic/commercial relations, even in the face of ambiguous or potentially hazardous situations, the Code of Ethics and Conduct shall represent a guide, the knowledge and application of which are essential and dutiful.

This Code, moreover, without substituting each person's responsibility and duty to act with common sense, is a fundamental element in the prevention of the criminal acts envisaged by Law Decree no.231 of 8 June 2001 and it is also drawn up as of and to the effects of the aforesaid regulatory dispositions, forming an integral part of the Company's Organization and Management Model.

All subjects in senior positions, such as Directors, Auditors or subjects with managerial functions, as well as all employees, collaborators, consultants and, more generally, all third parties entertaining relations with the Company, must never fail to comply with fundamental principles such as honesty, moral integrity, transparency and objectivity in pursuit of the corporate goals.

The Company, by setting up suitable tools for information, prevention and control, guarantees the transparency of the conduct implemented, intervening, where necessary, to halt any breaches of the Code and supervising the effective observance of the said Code.

### **3. ADDRESSEES**

The Addressees of this Code of Ethics and Conduct to the effects of Law Decree 231/2001, with the obligation to comply with the content of this same, are:

As internal subjects

- Directors of the Company and the Group, as well as those holding or performing functions of representation, administration, management or control;
- Company employees.

As external subjects

- staff of the Company, of the Group, and all subjects operating on behalf of or in the interests of these same.
- external professional figures, collaborators, consultants and, in general, subjects performing free-lance work for the Company and/or the Group;
- suppliers of the Company and/or the Group

The aforesaid external subjects, in as much as they hold commercial and labour relationships with the Company and/or the Group, shall be required to comply with the ethical values and the principles of conduct expressed in this Code of Ethics and Conduct and wherever conduct or actions, individual or corporate, are detected contrasting with the Company's values and principles, and/or with laws and regulations, all necessary initiatives will be adopted to suspend and terminate the relationship in question.

It is the duty of internal Addressees who entertain, especially but not exclusively, relations of a commercial nature with external subjects, to inform them of the obligations imposed by the Code of Ethics and Conduct, to require compliance with these same and to adopt suitable initiatives in the case of non-compliance.

Addressees holding the position of manager or head of a company function shall likewise be required to exercise supervisory activity, paying maximum attention and diligence towards all other Addressees with which they hold a relationship of direct or indirect hierarchical superiority. They shall, moreover, report any irregularity, infringement or breach of the principles contained in this Code of Ethics and Conduct, in the manner to be specified hereunder.

Compliance by Addressees, both internal and external, with the ethical values and the related applicative principles of conduct, illustrated in this Code of Ethics and Conduct, represents a contractual obligation as described in the penalty system.

#### **4. VALUES**

In the achievement of its goals, IMS TECHNOLOGIES S.p.A. takes inspiration from the following values, which are mandatory for Addressees of the present Code of Ethics and Conduct:

##### **4.1 Legality**

The Company is committed to conducting its activities in compliance with national and EU regulations, rejecting every form of illegal practice, including forms of conduct that may directly or even only indirectly constitute forms of collaboration with criminal associations.

The components of the organs of corporate governance, the corporate management and, in general, the Company's employees and collaborators, are required, in the course of their professional activities, to comply diligently with regulations in force, with this Code of Ethics and Conduct, with corporate procedures, with the Organization Model as of Law Decree 231 and with every other form of internal regulation.

Pursuit of a company interest may not be considered, under any circumstances, a defence for failure to comply with the law, nor may it justify dishonest conduct.

## **4.2 Honesty, moral integrity and correctness**

In the course of activities or relationships of whatsoever kind and nature, all those working for the Company are required to comply diligently with laws and regulations in force, as well as with the Code of Ethics and Conduct.

Their conduct shall be founded upon compliance with the fundamental principles of honesty, moral integrity, transparency, objectivity and respect for the individual personality when pursuing corporate goals and in relations with all persons or bodies, internal or external.

Operativity not consistent with a line of honest conduct shall not be justified under any circumstances.

The Company, therefore, will not entertain or pursue any type of relationship with anyone who adopts conduct differing from that established in this specific paragraph of the Code of Ethics and Conduct.

## **4.3 Transparency**

Transparency is an inalienable principle in all relations that Addressees entertain with their interlocutors. They shall undertake to provide at all times information that is accurate, objective, truthful, precise and unambiguous.

Those entrusted with the duty of keeping the written accounts shall make each entry accurately, completely, truthfully and transparently, and in such a way as to permit checks by subjects, including external subjects, appointed for the purpose.

The bookkeeping entries shall be based on information that is precise and verifiable and shall fully comply with internal bookkeeping procedures.

Each entry shall enable reconstruction of the related operation and shall be accompanied with suitable documentation.

All actions concerning corporate activities shall be supported by proper records which permit checks and controls on the process of decision, authorization and execution.

Addressees who become aware, in any way whatsoever, of omissions, falsifications or negligence in the bookkeeping or in the documentation on which the bookkeeping entries are based, are required to refer the facts to their superior and to inform the Supervisory Body.

#### **4.4 Confidentiality**

The Company ensures the confidentiality of the information and personal data subject to processing and the protection of information acquired in relation to corporate activities. It requires, moreover, that information obtained shall not be used for personal ends with the purpose of obtaining undue profit or in ways contrary to the law or such as may harm the rights, assets and goals of the Company.

Addressees are likewise forbidden, in fact, to use confidential information for purposes not linked to the exercise of their professional activity and in any case contrary to applicable regulations.

#### **4.5 Impartiality and equal opportunity**

All forms of discrimination are forbidden and, in particular, any discrimination based on race, nationality, sex, age, disability, sexual tendencies, personal or social condition, political or trade union opinions, philosophical orientation or religious convictions towards any subject inside or outside the Company.

#### **4.6 Corporate information and financial flows**

Every operation and transaction shall be correctly registered, authorized, verifiable and legitimate, and verification of the process of decision, authorization and execution shall always be possible. Every operation shall be supported by suitable documentary evidence in such a way that it shall always be possible to proceed, at any moment, with the performance of controls that prove the traceability, features and motivations of the operation and identify the person who authorized, executed, registered and verified the said operation.

All Addressees shall ensure the maximum truthfulness, transparency and completeness of the information, whether verbal or documentary (on paper or electronic support), produced during the performance of their activities, each in relation to their own sphere of competence and responsibility.

Any operation that may result in the smallest possibility of involving the Company in the suspicion of criminal offences as of Law Decree 231/01 is absolutely prohibited.

#### **4.7 Safety, protection of health and workplace conditions**

The Company ensures the protection of safety, hygiene and health in the workplace and deems it fundamental, in the performance of its activities, to respect fully the health, physical integrity and rights of its workers, in strict compliance with all dispositions of current laws on safety, hygiene and health in the workplace.

Any Addressee who observes situations prejudicial to health and safety in the workplace or who becomes aware of situations and/or facts that may harm or prejudice respect for the said rights, is required to report the matter immediately both to their superior and to the Supervisory Body.

#### **4.8 Professionalism and enhancement of human resources**

The Company recognizes the centrality of human resources and, for this purpose, is committed to enhancing the skills of its resources by making available to them suitable tools for training, professional updating and development.

#### **4.9 Risk culture**

The Company intends to develop in its employees a sensitivity to the risks underlying their daily activity. This awareness shall be evident in each person's concrete conduct. There must be a widespread perception of the way in which the internal control system guards concretely against such risks without harmful superimpositions or negligent omissions.

#### **4.10 Protection of personal data**

In compliance with laws in force, the Company is committed to the protection of the personal data of each of its employees and, more generally, of all those who interact with the Company (employees, customers and suppliers).

### **5. PRINCIPLES OF CONDUCT IN INTERNAL RELATIONS**

#### **5.1 Policies for selecting staff and collaborators**

Human resources are an indispensable element for the existence of the Company and a critical factor for successful competition on the market. The honesty, loyalty, skills, professionalism, seriousness, technical preparation and dedication of the staff are therefore among the fundamental conditions for achievement of corporate goals and represent the characteristics IMS TECHNOLOGIES S.p.A. requires of its Directors, employees and collaborators in whatsoever role.

In order to contribute to the development of the corporate goals, and to ensure that such goals are pursued by all collaborators in compliance with the ethical principles and the values that inspire IMS TECHNOLOGIES S.p.A., the company policy is to select each employee, consultant or collaborator in whatsoever role in accordance with the values and features stated above. In the course of selection, the Company shall act to ensure that the resources acquired correspond to the profiles effectively necessary for the corporate needs, avoiding favouritism and facilitations of any kind.

## 5.2 Prevention of conflicts of interest

In the course of conducting any activity, each subject involved shall avoid any conflict between their personal, social, financial or political interest and the advancement of the business interests of IMS TECHNOLOGIES S.p.A. or its customers.

A conflict of interests shall be deemed a case in which the Addressee pursues an interest other than the mission of the Company or the Group or performs activities that may, in any case, interfere with their capacity to make decisions in the exclusive interests of the Company, or where they gain personal advantage from the latter's business opportunities.

By way of example and not exhaustively, the following forms of conduct constitute situations of conflicts of interest:

- *possession, even indirectly, of holdings or assumptions of economic-financial interest in companies that are suppliers, customers or competitors of companies of the Group;*
- *assumption of company appointments or performance of work activities, of whatsoever kind, with suppliers and customers.*

The occurrence of conflicts of interest, as well as being contrary to the law and the principles established in the Ethical Code, is prejudicial to the Company image and integrity.

Directors, employees and collaborators shall therefore rule out any possibility of superimposing or in any case combining, by making use of their functional position, economic activities answering to a logic of personal and/or family interest with the duties they perform within the Company.

Those who believe they may be in conflict shall inform their superior or the Human Resources Manager in order that the Company may decide whether such a conflict effectively exists. The Addressees, in such a concrete case, shall abide by the Company's decisions.

## 5.3 Employees' and collaborators' duties

Each employee and collaborator is required act loyally in order to comply with the obligations signed in the labour contract and with the dispositions of this Code, ensuring the required services.

For this purpose, staff are required to operate diligently to protect the corporate assets, adopting conduct that is responsible and in line with the operative procedures put in place to regulate these same.

All employees and collaborators of the Company and/or the Group are responsible for the protection of the material and financial resources entrusted to them and have the duty to inform the proper units of any risks or harmful events.

All staff shall abide by the dispositions of corporate policies regarding the security of information in order to guarantee the integrity, confidentiality and availability of this same, and shall draw up their documents using clear, objective and exhaustive language which will enable any necessary checks by managers or by authorized external subjects.

#### **5.4 Use of corporate resources**

All Addressees are responsible for the protection and conservation of the corporate resources entrusted to them for the performance of their duties, as well as for their use in a manner that is proper and compliant with corporate purposes and the company procedures governing their use.

In particular, all Addressees shall:

- employ diligently the corporate resources entrusted to them;
- avoid improper use of corporate resources that may result in unlawful acts, damage or reduced efficiency, or in any case, which may be in contrast with the Company's interests;
- comply strictly with company procedures and applicable laws governing their use, particularly with regard to software or, in general, the protection of intellectual property rights;
- base their use of the resources on the highest levels of security, decorum and respect for other people's sensibilities.

The Company forbids, in particular, any use of corporate resources that may represent an infringement of current laws, or in any case an offence to people's liberty, integrity and dignity, especially that of minors.

The Company likewise forbids any use of corporate resources that may result in undue intrusion or damage to other parties' IT systems.

## 6. PRINCIPLES OF CONDUCT IN EXTERNAL RELATIONS

### 6.1 Relations with customers

The Company deems it fundamental to maintain high quality standards in its services.

In their relations with its customers, all employees and collaborators are required to align their conduct with criteria of correctness, courtesy and helpfulness, providing, where requested and necessary, information that is exhaustive and adequate, avoiding recourse to practices that are elusive, incorrect or, in any case, aimed at undermining the interlocutor's independence of judgement.

### 6.2 Relations with suppliers

The Company applies maximum transparency in its relations with suppliers of goods and services, in compliance with current laws and regulations, as well as with internal procedures regarding purchases and selection of suppliers.

It is the Company's policy, in fact, to deal in good faith and transparently with all potential suppliers, as well as to avoid even a mere appearance of setting up negotiations that are unjustifiably partial or acting according to a logic motivated by favouritism or dictated by the certainty or the hope of obtaining advantages, even with reference to situations extraneous to the supplier relationship, for the negotiator or for the Company.

### 6.3 Relations with public authorities

In its relations with the Public Administration or with bodies performing activities of public utility or public interest, the Company complies strictly with the applicable EU, national and Company regulations.

All Addressees of this Code shall abstain:

- from offering opportunities of work or any favourable advantage to the public official involved in the relationship, to his/her family members or to subjects in any way connected with this same;
- from offering the aforesaid subjects gifts, presents or benefits, even via third parties, except where these are acts of courtesy of modest value;
- from promising or causing to be promised any other forms of benefit or advantage;
- from influencing improperly, even via third parties, the decisions of the institute concerned;
- from creating situations of advantage in favour of the public official involved in the relationship, of his/her family members or of subjects in any way connected with this same, by means of simulated operations.

In the case that the Company is a Party in civil, penal or administrative judicial proceedings, including out-of-court proceedings, the Company bodies, its employees and its consultants shall under no circumstances adopt conduct that may induce provisions that result in unlawful advantage to the said Company.

In their relations with the Judicial Authorities, all employees shall offer the fullest collaboration, providing truthful statements. Any form of reticence, silence and falsity is contrary to the interests of the Company because IMS TECHNOLOGIES S.p.A. intends to act in full compliance with the law.

#### **6.4 Relations with political and trade union organizations**

IMS TECHNOLOGIES S.p.A. does not directly or indirectly favour or discriminate against any organization of a political or trade union nature. The Company abstains from making any contribution, directly or indirectly, in any form whatsoever, to political and trade union parties, movements, committees and organizations, or to their representatives and candidates, except where these are due on the basis of specific legal dispositions.

#### **6.5 Conferral of professional appointments**

Collaborators of whatsoever kind and consultants of the Company and/or Group are required, during the performance of the contractual relationship installed or the appointment received from the said Company and/or Group, to act with correctness, good faith and loyalty, complying, in so far as is applicable to them, the dispositions of this Code of Ethics and Conduct, Company regulations and the instructions and dispositions imparted to staff of the Company.

The Company shall identify and select collaborators and consultants with absolute impartiality, autonomy and independence of judgement, without accepting conditioning or compromises of any kind aimed at implementing or obtaining favours and advantages. In this context, the sole requisites are professional skill, reputation, independence, organizational capacity, correctness and precise execution of contractual obligations and appointments conferred.

#### **6.6 Gifts, benefits and promises of favours**

IMS TECHNOLOGIES S.p.A. forbids all those operating in its interests, in its name or on its behalf, to offer or promise, even indirectly, money, gifts, goods, services or favours that are not due (even in terms of employment opportunities) and which are extraneous to normal relations of courtesy between the parties.

## 6.7 Protection of the environment

The environment is a primary asset which IMS TECHNOLOGIES S.p.A. undertakes to safeguard and, for this purpose, the Company is committed to managing its activities by seeking a balance between economic initiatives and environmental needs, developing its business in maximum compliance with current environmental regulations and with constant consideration for the rights of future generations.

The Company undertakes to protect the environment in all its activities, using processes, technologies and materials that enable it to avoid or limit any impact deriving from Company activities in terms of pollution.

All Addressees of the Code shall always evaluate environmental aspects thoroughly and manage them preventively, intervening actively to avoid incorrect environmental situations and conduct.

The commitment to disseminating the culture of the environment in the workplaces shall involve all staff in informative activities.

## 7. MONITORING AND CONTROL OF THE APPLICATION OF THE CODE OF ETHICS AND CONDUCT

IMS TECHNOLOGIES S.p.A. undertakes to comply with, and to require compliance with, the regulations of the Code of Ethics and Conduct, also by means of the institution of the Supervisory Body as of Law Decree 231/01, appointed by with a resolution of the Board of Directors.

The Supervisory Body is invested with the duty and powers to monitor and control implementation of the regulations of Ethical conduct, by means, in particular, of:

- constant vigilance over application by the Addressees of the regulations of the Code of Ethics and Conduct;
- promotion and assessment of every report and suggestion aimed at improving the Code of Ethics and Conduct;
- promotion of programmes of communication, training and updating for all Addressees;
- opinions on revision of the Code of Ethics and Conduct or on the most significant corporate policies and procedures, to ensure these are consistent with the said Code.

In order to permit effective application of the Code of Ethics and Conduct, all Addressees have the right to report to the Supervisory Body presumed cases of infringement of the values and related principles of conduct outlined in this Code of Ethics and Conduct of which they become aware, or to report any potentially critical attitude or situation. Reports may be submitted by email to the electronic mailbox managed by the Supervisory Body.

The Supervisory Body shall act to ensure that the authors of the reports are not subject to any forms of retaliation, discrimination or penalization or any consequences whatsoever deriving from these same, by guaranteeing confidentiality as to their identity, without prejudice to legal obligations and the protection of the Company's rights or those of persons accused in bad faith.

In particular, the following dispositions shall be observed:

- information and reports, from whomsoever they derive, including those regarding any infringement or suspected infringement of the principles set out in the Code of Ethics and Conduct, shall be made in writing and shall not be anonymous;
- any anonymous reports shall be taken into consideration for further examination only if they are described in detail and contain, therefore, all the objective elements necessary for the subsequent phase of verification. Anonymous reports deemed unreliable shall not be taken into consideration;
- information and reports shall be sent directly to the Supervisory Body by the person concerned.

The Supervisory Body shall evaluate all reports received, deciding whether to take specific action.

In any case, protection is envisaged for the reporting person that will keep him/her safe from retaliatory and/or discriminatory actions, as stated in Law 179/2017.

All Addressees are required to collaborate with the Supervisory Body, in order to permit this same to gather all further information necessary for a correct and complete evaluation of the reports received.

Upon receiving reports, the Supervisory Body shall examine the facts, hearing, if necessary, the author of the said reports and the person alleged to have infringed the regulations.

The Supervisory Body may avail itself, for the analysis and evaluation of conduct constituting infringements of the Code of Ethics and Conduct and of legal regulations, of specific units or subjects competent in specific questions.

## 8. PENALTY SYSTEM

Where an infringement of the Code of Ethics and Conduct has been ascertained, the Supervisory Body shall refer the report to the Board of Directors, requesting the application of any penalties deemed necessary. If the infringements concern one or more members of the Board of Directors, the Supervisory Body shall refer the report and the proposals for disciplinary penalties to the Board of Directors, for all necessary actions.

The empowered functions, activated by the bodies as of above, shall approve the dispositions, including the penalties, to be adopted in accordance with current regulations, overseeing their implementation and referring the result to the Supervisory Body. If the penalty proposed by the Supervisory Body is not applied, an adequate reason shall be given.

Any breach of the principles established in the Code of Ethics and Conduct and in the procedures envisaged by the internal protocols as of Model 231/2001, shall compromise the relationship of trust between the Company and its Directors, partners, employees, consultants, collaborators of whatsoever kind, suppliers, commercial and financial partners, and with the Addressees in general. Such breaches will therefore be pursued vigorously, swiftly and immediately, in a suitable and proportionate manner, by the Company, invoking the disciplinary procedures envisaged in Model 231/2001, independently of any penal relevance the conduct may have and of the opening of criminal proceedings where the conduct constitutes a criminal offence.

Non-compliance with, or infringement of, the rules of conduct indicated in the Code by employees of the Company shall constitute a breach of the obligations deriving from the labour relationship and shall give rise to the application of disciplinary penalties. The penalties to be imposed shall be applied in compliance with the dispositions of the Law and the applicable National Collective Labour Contract.

Such penalties shall be imposed on the basis of the significance of each single case and shall be proportionate to its seriousness.

Verification of the aforesaid infringements, management of the disciplinary proceedings and imposition of the penalties shall be reserved for the Company functions appointed and empowered for this purpose.

In the case of a breach by the Directors of the rules of conduct indicated in the Code of Ethics and Conduct, the Company shall assess the facts and conduct and shall assume suitable initiatives with regard to those responsible as of the dispositions of the Law and of the applicable National Collective Labour Contract, taking into account that such infringements constitute a breach of the obligations deriving from the labour relationship.

Any conduct by collaborators, consultants or other third parties linked to the Company by a free-lance contractual relationship, constituting an infringement of the dispositions of the Code of Ethics and Conduct, may give rise, where sufficiently serious, to termination of the contractual relationship, without prejudice, independently of the termination of the contractual relationship, to any request for compensation where such conduct results in damage to the Company.

## 9. GLOSSARY

- **Directors:** subjects covering the function of the Company organ invested with the power to manage corporate business and to represent the Company in its external relations.
- **Shareholders:** subjects (natural or legal persons) holding one or more shares in the Company
- **Customers:** subjects (natural or legal persons) purchasing the products or using the services of IMS TECHNOLOGIES S.p.A
- **Collaborators:** subjects linked to IMS TECHNOLOGIES S.p.A. or to Gruppo Coeclerici S.p.A by a so-called atypical labour contract or who provide their activities in the form of a training and guidance apprenticeship;
- **External collaborators:** subjects not linked to IMS TECHNOLOGIES S.p.A. or to Gruppo Coeclerici S.p.A by a labour contract but who nevertheless cooperate for the achievement of the goals of IMS TECHNOLOGIES S.p.A. (for example, Consultants);
- **Consultants:** subjects acting in the name of and/or on behalf of IMS TECHNOLOGIES S.p.A. on the basis of a mandate or other contractual labour relationship;
- **Suppliers:** subjects (natural or legal persons) providing goods, work and services to IMS TECHNOLOGIES S.p.A;
- **Model:** the Organization, Management and Control Model aimed at preventing the commission of criminal offences as of Law Decree 231/01;
- **Corporate Organs:** this term shall be deemed to mean the Board of Directors and the Board of Auditors;

- **Supervisory Body:** A body envisaged by art. 6 of the Decree, having the duty to supervise the functioning and observance of the Organization, Management and Control Model, as well as the updating of this same,
- **Staff:** Top Management, employees and collaborators;
- **Employees:** all those entertaining a salaried labour relationship, including Managers with the exception of Top Managers;
- **Public Administration:** national and foreign Public Administration, including the related officials and subjects appointed to perform a public service;
- **Company:** IMS TECHNOLOGIES S.p.A
- **Top Management:** subjects holding functions of representation of the Directors or management of IMS TECHNOLOGIES S.p.A. or who exercise, even *de facto*, management and control of the Company.



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