

CODE OF CONDUCT

Processing and verification

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Approval and issuance

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1. PREMISE

I.T.A. in the certification activity has deemed it necessary to equip itself and provide all the personnel involved in these activities with a Code of Conduct designed to clearly regulate what is the conduct to be taken during the entire certification process in order to prevent any sort of conflict of interest.

2. INTRODUCTION AND GENERAL PRINCIPLES:

Legality, honesty and fairness - I.T.A. undertakes to operate in compliance with the laws and regulations in force. In carrying out their functions and activities, the company management, employees, collaborators and all those who, for various reasons in the certification process, are required to observe the rules of the legal system and to act with honesty and fairness. Under no circumstances may the company be pursued or carried out in violation of laws, regulations and internal procedures.

Transparency - I.T.A. undertakes to disseminate, internally and externally, clear, precise, accurate and understandable information to allow recipients to make informed decisions regarding the relationships to be maintained with the company itself.

Confidentiality – I.T.A. is committed to respecting the right to privacy. The data processed in the certification process will be processed in compliance with current legislation. This commitment will be assumed by each subject involved in various capacities in the certification process.

Fair competition - I.T.A. recognizes the value of competition when inspired by the principles of fairness, fair competition and transparency towards operators on the market.

Quality - I.T.A. directs its activity to maximum customer satisfaction by ensuring an assiduous and constant commitment to the continuous improvement of the quality of the services offered.

Responsibility - I.T.A. promotes and promotes respect for ethical, legal and social responsibility principles that determine the well-being and health of its workers in particular and more generally of the entire community.

Environment, Health and safety at work - Sensitive to the legitimate civil, social and environmental demands of the community and its employees, I.T.A. defines and establishes as a primary commitment the pursuit, maintenance and continuous improvement of the safety and health of workers, as well as the protection of the environment.

Conflict of interest - real (or current) situation in which a secondary interest (financial or non-financial) of a person tends to interfere with the primary interest of the company (i.e. the common good), towards which the former has precise duties and responsibilities.

3. SCOPE OF APPLICATION

Compliance with the rules of this Code of Conduct is to be considered an essential part of the obligations incumbent on all external and external personnel of I.T.A..

4. GENERAL CRITERIA FOR THE CONDUCT OF INSPECTION STAFF

The staff is called to carry out their activities with commitment and professional rigor appropriate to the responsibilities assigned and must avoid any action or activity that could lead to conflicts of interest with I.T.A.. The personnel involved in the certification process will sign a special clause to this effect. If there

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are situations of conflict of interest, even if only potential, the person involved must communicate this circumstance to the Technical Director, refraining from carrying out any operation that has to do so.

The collaborators of the I.T.A. must act loyally in order to comply with the obligations signed in the contract that regulates their position and, consequently, as provided for in this Code of Conduct. They must also know and implement the provisions of company policies on information security to ensure its integrity and confidentiality.

Employees are obliged to avoid conflicts of interest by refraining from taking advantage personally, directly or through third parties, or to benefit others, business opportunities or others to which they have become aware in the performance of their duties.

All internal and external staff of I.T.A. are required to adopt a behavior inspired by correctness and professional ethics

In particular, both internal and external auditors may not maintain or have maintained professional relationships with client organisations in the last two years from the date of their appointment.

The auditors must also undertake, by signing each individual audit assignment, not to maintain professional or service relationships with the same subjects for the following three years

I.T.A. through the Control Committee will periodically ascertain the maintenance of this commitment

Staff are committed to protecting and avoiding misuse of confidential information. These data are managed with appropriate internal procedures, which ensure their dissemination only among those who have justified interest and for exclusively corporate purposes.

The staff also undertakes to consider all data, documents, materials and in any case all information - in any form or on any medium - received or obtained for the performance of the assignment as strictly private and confidential and of exclusive property - material and intellectual - of the client organization and therefore to take all necessary measures not to cause damage to the client organization and not to prejudice confidentiality, secrecy and confidentiality of the aforementioned data, documents, materials and information;

The technical management, employees, collaborators and those who, for various reasons, are involved in the certification process are required to keep confidential the news and information learned in the exercise of their functions and not to use them to make profits or private interests even of third parties. The duty of confidentiality of information must be observed even after the termination of the relative relationship with I.T.A..

5. CODE OF ETHICS AND CONDUCT

The Code of Ethics and Conduct is part of the adaptation program to Legislative Decree 231 of 2001 "Discipline of the administrative liability of legal persons, companies and associations even without legal personality, pursuant to Article 11 of Law No. 300 of 29 September 2000". This paragraph is intended to list in an exemplary but not exhaustive way a series of rules underlying **responsible behavior; impartial and professional:**

1. notify irregularities that can be documented and found in the face of the requirements of the rules and regulations applicable in accordance with the ITA QMS imposed by CI.;
2. carry out its activities without material and moral, political and ideological enslavement;

3. place a relationship of trust at the base of its professional services;
4. not to make use of public offices or political affiliations, to prospect in a clear or implicit way, advantages for oneself or for others;
5. avoid any circumstance of carrying out actions detrimental to the interests and good name of ITA;
6. act in a spirit of cooperation and fairness towards other colleagues;
7. base the behavior as well as professionalism also on loyalty and good faith, respecting the commitment to confidentiality on all acts (documentation, letters, communications, etc.) and / or information of which it may become aware during the performance of its functions in compliance with the privacy law in force, to act impartially and not to allow commercial pressure, financial or other impartiality;
8. not to use any data, information or document received from ITA, for the performance of its professional task, except for the purposes for which the document or data is provided;
9. not to request or retain any company document, except within the limits strictly necessary to highlight or carry out the assigned activities and in any case always within the terms provided for by the procedures adopted by ITA;
10. keep with the utmost care and diligence the documents and data provided by ITA, until they are returned;
11. not to communicate to third parties information concerning the industrial and commercial activity relating to ITA and to the organizations interested in the certification of which he has become aware in the performance of the tasks entrusted to him;
12. not to use, even implicitly, one's position to influence decisions in one's favor or in favor of relatives, friends and acquaintances for purely personal purposes;
13. not to make inappropriate statements stating or suggesting that certification could be simpler, easier, faster or less costly, if ITA is used;
14. maintain the utmost impartiality to avoid and to point out any situation of conflict of interest, in the performance of the activities, if he considers himself to be in a situation of conflict between his personal interest, on his behalf or on behalf of third parties, and the interests of ITA;
15. report to ITA any incompatibility or inadequate competence in the face of specific assignments;
16. behave in a way that makes decisions based on the objective evidence found, avoiding any preconception with respect to information or other aspects that are not strictly relevant to the object of their duties.
17. observe and comply with all laws and regulations in force in the geographical areas in which ITA operates, this also means accepting all requests from the organizations where ITA services are carried out, regarding the use of behavioral rules for safety in the workplace and in others, using any tools and protection devices provided and anything else required and necessary by law;
18. not to engage, collaborate or give cause to the realization of behaviors prohibited by law, provided for or that may potentially become so as per Legislative Decree 231/01;
19. not solicit or accept money, goods, services or benefits of any kind from suppliers or public or private customers, in connection with their job or in any case with the activity of ITA;
20. present each transaction and transition correctly recorded and authorised in such a way as to allow its possible verification and traceability;
21. have no commercial implications, or other forms of collaboration with the organization being evaluated, which could give rise to conflicts of interest with the evaluation assignments assigned by ITA;

22. report any working links with the organization subject to verification in the previous three years from the date of assignment of the assignment;
23. report any corporate and / or family ties with the consulting company and / or consultant of the organization being verified;
24. report any corporate and/or kinship ties with the organization;
25. not to provide consultancy to the organisation, subject to verification, for at least two years from the date of assignment of the assignment itself;
26. operate in accordance with ITA policies and procedures;
27. protect, within its scope, the confidentiality of the proprietary information of ITA and of the client organization attributable to intellectual property, the set of concepts that integrate, improve, specify and make applicable the SG, the conditions for better implementation of a procedure, of the product / service provided, all the detailed, useful and necessary information for the design, construction, sale and use of the product / service, everything that is aimed at improving the existing SG, facilitating its application, and / or use, and / or marketing, deriving from studies, research or experience (technical, technological, financial, marketing or commercial information, in the form of reports, communications also of an internal nature, studies, reports, lists, data, tables, cards, printouts, specific internal circulars, security procedures, confidentiality or security clauses, security contracts, secrecy contracts, and so on - both on paper and on magnetic, optical or magneto-optical support, etc.), provided that they constitute a corporate utility asset;
28. not to illegally exploit the secrets or results of the work as well as the experience gained in ITA;
29. not to disclose to third parties, or acquire or use company information and experiences;
30. not to perform acts contrary to professional propriety
31. use computers in a common sense, responsible manner, and for legitimate business purposes;
32. protect the security of computer systems;
33. not to use electronic communication systems to improperly disseminate copyrighted or licensed materials (e.g. copyrighted rules);
34. use electronic communication systems (e-mail, mobile phones and fixed network telephones) exclusively for business and non-personal purposes;
35. not to use illicit techniques and means to obtain an advantage over competitors or to cause them damage;
36. provide adequate and relevant information to each customer or to the market, including advertising material and above all to check that such material is accurate and
37. not to be misled, in particular as to the nature, quality or origin of the products or services, due to the manner and context in which it is used, or to infringe another's copyright, industrial property, or other exclusive right of third parties;
38. provide signed and updated curriculum vitae (in relation to the consultancy activities carried out) in a format that cannot be modified annually and / or on request;
39. apply the procedures and instructions of ITA;
40. make themselves available for the refresher and training sessions scheduled by ITA

6. METHOD OF APPLICATION

This Code of Conduct has been prepared by I.T.A. for the prediction of the behavioral risks of internal and external personnel or in any case involved in various ways in the certification process, in order to prevent conflict of interest.

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Organizational structure

The I.T.A., in consideration of ethical requirements and in particular on conflict of interest, has launched an internal process of Risk Analysis and risk prevention.

The initial preparation and subsequent updates of the Risk Analysis were preceded by a series of analysis activities aimed at building a system for identifying, preventing and managing potential crime-risks, the results of which were formalized in specific documents. The various activities carried out are briefly described below:

1. Mapping of risk activities and identification of potential risks, and, in particular, of conflict of interest risks. The objective of this phase was the analysis of the corporate context, in order to map the areas of activity of the I.T.A. and, among these, to identify the processes and activities in which the crimes of conflict of interest could be carried out - in the abstract. The identification of company activities and processes/activities at risk in relation to functions and people was implemented through examination of company documentation (I.T.A. Management System: organizational structure, procedures) and in-depth analysis with key subjects within the corporate structure. For potentially achievable crimes of conflict of interest, the occasions, purposes and methods of committing the illegal conduct have been identified. The result of this activity was represented in strict coherence with the provisions of the UNI CEI EN standard ISO/IEC 17021-1:2015.
2. The mapping of potential risks was therefore identified in order to identify strengths and weaknesses (internally), and, (outside the Company) threats and opportunities. We then proceeded to analyze the system of preventive controls existing in the processes / activities at risk, in order to carry out the subsequent judgment of suitability of the same for the purposes of risk prevention.
3. On the basis of the results obtained in the previous phase, the Company has identified a series of actions to integrate and/or improve the control system and the related initiatives to be undertaken. The results obtained have been formalized in special tabular results, organized in a matrix.
4. Do not use the news and information learned in the exercise of its functions to make profits or private interests even of third parties. The duty of confidentiality of information and the prohibition of non-use must be observed even after the termination of the relevant relationship with the Company.

7. THE CDC AND ITS REGULATION

The supervisory activity, in full compliance with the ethical conduct of the companies and in particular on the absence of conflict of interest, is carried out by the Control Committee. For the composition of which please refer to the relevant Regulation

Attribution and characteristics

The task of supervising the functioning and compliance with this Code of Conduct adopted by the Company and above all on the prevention of Conflict of Interest, is entrusted to the CDC, endowed with autonomous powers of initiative and control, without constraints of subordination that can in any way limit or prevent its activity.

The CDC operates with impartiality, authority, continuity, professionalism, autonomy and to this end: it is free to access all sources of information of the CB; has the right to view documents and consult data,

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also on the basis of reports provided by employees; may carry out checks, even periodic checks, on the functioning and compliance with the Code of Conduct.

To guarantee the independence of the CDC, it also reports directly to the I.T.A. High Management.

Reports to the Audit Committee

In order to ensure the efficiency of this Code of Conduct - respecting privacy and individual rights - it provides information channels through which all those who become aware of any illegal behavior carried out within the I.T.A. can report, freely, directly and confidentially, to the CDC. It is responsible for the timely and careful verification of the news transmitted, in order to submit the case in place to the competent corporate function for the application of any disciplinary sanctions or the activation of contractual termination mechanisms, where required by law.

In this regard, correspondence regarding the above reports can be addressed to the headquarters of the I.T.A. addressed to the Control Committee.

Information flows of the Control Committee towards the corporate bodies

If the CDC ascertains any violation of the Code of Conduct, it will notify the Top Management, which will inform the body responsible for disciplinary proceedings and the imposition of the sanction. On the merits, the following are listed, only by way of example, some types of violation of this Code of Conduct:

violations of this Code of Conduct or of the procedures by the Recipients ascertained following reports or direct investigations that are considered well-founded and significant;

detected organizational or procedural deficiencies, capable of determining the concrete danger of committing any crimes;

regulatory changes that are particularly relevant for the implementation and effectiveness of this Code of Conduct;

existence of criminal proceedings against persons operating on behalf of I.T.A., or proceedings against I.T.A. in relation to relevant crimes;

the outcome of the investigations ordered following the launch of investigations by the Judicial Authority regarding relevant crimes;

any other information deemed useful for the purpose of taking urgent decisions by the Chief Executive Officer.

Information flows towards the Behavioural Committee

It is the obligation of all staff to inform the CoC responsible for supervising the functioning and compliance with this Code of Conduct.

The obligation of a structured information flow is conceived as a tool to guarantee the supervision of the effectiveness and effectiveness of this Code of Conduct and for the possible subsequent verification of the causes that made possible the occurrence of the crimes, as well as in order to give greater authority to the requests for documentation that are necessary to the CoC during its verifications.

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8. STAFF TRAINING AND DISSEMINATION OF THE CODE OF CONDUCT IN THE COMPANY CONTEXT

Staff training

I.T.A. promotes the knowledge of this Code of Conduct and its updating among all employees who are therefore required to know its content, to observe them and contribute to their implementation.

By virtue of the above, with reference to the training of personnel with respect to this Code of Conduct, interventions are envisaged aimed at the widest dissemination of the provisions contained therein and the consequent awareness of all personnel to its effective implementation.

Due to the above, the level of training and information of the Company's personnel will have a different degree of depth, with particular attention to those employees who work in areas at potential risk.

Finally, any updating training sessions will be carried out in the event of significant changes made to this Code of Conduct or related to supervening regulations relevant to the Company's activity.

Information to third parties

The Company promotes the knowledge and observance of this Code of Conduct also among third parties interested in any case, such as suppliers, customers, consultants, collaborators in various capacities, external auditors, etc.

Attachments:

Annex I - (Communication for the Prevention of Conflict of Interest)

Annex II - (DECLARATION of acknowledgment of the contents of the Code of Conduct)

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10. Annex I - (Communication for the Prevention of Conflict of Interest)

Naples, there

Dear I.T.A. Viale Maria Bakunin,41
Naples (NA)

To the Kind Attention of the General Management

Subject: communication by the staff of the Body of Interest (or directly superior hierarchically) in order to prevent/manage conflicts of interest

Hereby, in addition to what has already been communicated, I inform the I.T.A. that:

- I took up the position of..... in the Board of Directors of.....
.....
- I took on the function of..... near.....
.....
- I have acquired a significant package of shares and/or shares of the Company.....
- I have carried out / I am carrying out professional activities in favor of.....
- I took on the position of.....
- I took up the position of.....
- I must inform you that I am afraid of being and / or may enter into conflict of interest for the following circumstance.....
-

Signature

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11. Annex II - (DECLARATION of acknowledgment of the contents of the Code of Conduct)

Dear I.T.A. Viale Maria Bakunin,41
Naples (NA)

To the Direction General

DECLARATION

I hereby declare that I have read the Code of Conduct for the prevention of conflict of interest and I undertake, within my competence, to respect it.

Signature