

CODE OF CONDUCT

Goals and commitments

The mission of NTE Process is to accompany customers in all phases of design, supply and innovation of industrial plants. We want to be a reliable and punctual partner, with an innovative approach. We want the adoption of our solutions to have a positive impact on the planet, helping our customers to produce in a sustainable way.

In order to make this possible, every employee and collaborator of NTE is called upon to do their part. Our Code of Conduct helps us to do that: it expresses our values and declines them in behavioral guidelines which all employees are required to abide by, in order to act with professional integrity at all times.

This Code recognizes our responsibility towards the commercial, social and natural environment in which we operate, as well as towards our suppliers, customers and partners around the world.

The Code is divided into four areas of responsibility: responsibility towards other workers; responsibility towards suppliers, customers and partners; responsibility towards NTE Process; responsibility towards the community and the environment.

RESPONSIBILITY TOWARDS OTHER WORKERS

Protection of health and safety

For NTE, the protection of the health and safety of workers and of all persons who carry out activities at the production sites of the company or directly controlled by it is an indispensable principle, which is affirmed in the corporate Sustainability Policy and in the Policy on Health and Safety at work. The implementation of this principle is guaranteed by the Company's Health and Safety Management System (SGSL), whose effectiveness depends on the dissemination of a culture oriented towards risk prevention at every level of the company and the active participation by all of us

Our role in practice

As employees of NTE it is our duty to:

- make sure that we understand and comply with all company regulations and procedures provided for by the SGSL, including the correct use of protective tools and clothing based on the activity that is taking place;
- not to take alcohol, illegal substances or any other substance that could compromise our lucidity and our safety at work;
- carry out only works for which we are trained and qualified;
- become familiar with the emergency management procedures at the workplace (fire prevention procedures, first aid, location of emergency exits and evacuation...);
- report dangerous situations and incorrect behaviour.

Diversity, inclusion and fight against discrimination and harassment

As stated in our Sustainability Policy and Policy on Human and Workers' Rights, NTE Process is committed to enhancing diversity and promoting inclusion within the company, applying a "Zero Tolerance" criterion to any form of discrimination and harassment in the workplace.

Our role in practice

As NTE employees it is our job to:

- treat all colleagues and workers fairly, with respect and consideration;
- enhance diversity, recognizing the unique characteristics of each colleague and supporting the resulting potential;
- comply with company policies and procedures regarding selection and hiring, thus guaranteeing fair and equal job opportunities for all qualified candidates, without any form of discrimination or favoritism based on considerations relating to gender, ethnicity, age, sex, sexual orientation, ability, health status, political opinion, nationality, trade union membership, marital status;
- never perpetrate physical or verbal acts of

bullying, mobbing or intimidation, and promptly report the occurrence through the anonymous reporting channels that will be activated by the Company;

- do not make derogatory and humiliating personal comments and do not feed gossip towards your colleagues;
- recognize our unconscious prejudices, avoiding making discriminatory remarks or comments, even if mistakenly understood as “jokes”.

RESPONSIBILITY TOWARDS SUPPLIERS AND PARTNERS

Dialogue with suppliers and partners

NTE bases its relations with the supply chain and with its partners on principles of ethics, integrity and transparency, committing itself to comply with the regulations in force and the obligations undertaken and to select suppliers on the basis of procedures based exclusively on quality, reliability and sustainability criteria (consistently with our Responsible Purchasing Policy and the Supplier Code of Conduct). Our approach is characterized by the search for a constructive dialogue aimed at developing medium / long-term partnerships with the aim of constantly raising quality and sustainability standards.

Our role in practice:

- As NTE employees it is our job to:
- comply with our Responsible Purchasing Policy for all procurement-related activities;
- promptly report any attempt to undue pressure exercised by a supplier, including through the promise of personal benefits or favours, in kind or in cash, and any request for deviation from NTE Process procedures relating to the qualification or management of suppliers;
- promptly report any suspicion of violation of human rights by partners or suppliers and any other non-compliance with our Code of Conduct for Suppliers, and ensure that any report made is followed by an effective corrective action;
- report to the Marketing Office the receipt of small gifts by suppliers, so that a correct and fair distribution is arranged.

Fair competition and anti-corruption

NTE Process competes honestly, respecting the

European and Italian legislation on antitrust, anti-corruption and other applicable laws on free competition. We never try to take advantage of the market by entering into restrictive agreements of competition, by offering and / or receiving bribes, gifts, personal advantages or by committing other activities of a corrupt nature in complicity with competitors, partners, suppliers or customers, and we expect the same from behaviour from them

Our role in practice:

As NTE employees it is our job to:

- comply with antitrust legislation and other laws governing competition;
- avoid unnecessary contacts and communications with competitors, especially if related to pricing strategies, sales conditions, offers;
- not to accept or offer bribes from / to suppliers, customers, partners, third parties;
- never accept or offer gifts that may in any way affect our judgment and influence the reaching of an agreement or decision at company level;
- keep accurate and complete records of all business expenses;
- promptly report any suspicion of violation of our regulations in the field of anti-corruption and fair competition by the people of NTE, through the anonymous communication channels that will be activated by the Company;
- report any inappropriate behaviour on the part of business partners or other external stakeholders to the Management.

Compliance with current regulations on international trade

We operate in a global context, interacting with partners from all over the world. Therefore, we must comply with all applicable international trade laws and regulations, including those relating to export and import, trade sanctions and customs procedures.

Our role in practice:

As NTE employees it is our job to:

- make sure to have at least a basic understanding of the main concepts related to international trade applicable to your business;
- ensure to be familiar with all the essential elements of a transaction (the products, the parties, the end use and the country of destination) and

comply with all applicable laws and regulations;

- ensure that products are accurately identified, evaluated and classified with respect to export controls and customs regulations;
- make sure to have all the required authorizations before proceeding with import and / or export activities.

RESPONSIBILITY TOWARDS NTE PROCESS

Prevention of conflicts of interest

Every business decision must be based exclusively on criteria of quality, price, delivery, reputation and experience: any different conditioning, based on personal interests, is not consistent with the obligation of integrity that we have towards our stakeholders and is, therefore, not admissible. Because of that, NTE provides mechanisms for the prevention of potential conflicts of interest, understood as those situations in which an employee has an interest or an obligation towards another person or an activity that could conflict with his business activities, its decision-making processes and therefore the interests of our company.

Our role in practice:

As NTE Process employees it is our job to:

- avoid placing ourselves in situations in which personal interests may conflict with those of the Company, for example cases in which we are in a position to be able to hire, supervise or promote family members or other people with whom we have a close personal relationship;
- promptly disclose to the HR Department if we are in a situation of potential conflict of interest. This does not constitute a violation of the Code in itself, but the attempt to keep it hidden from the company can lead to disciplinary action.

Use of Intellectual Property and Confidential Information

We protect our intellectual property and follow NTE's internal policies on the fair use, safekeeping, marking and handling of confidential information. We also use our company assets (office supplies, equipment, IT and technology tools owned by NTE) appropriately.

Our role in practice:

As NTE employees it is our job to:

- use NTE confidential information exclusively for business purposes and disclose it only to those who are authorized to access;
- take care to protect NTE's confidential information from unintentional disclosure, for example by leaving it easily accessible in open spaces and / or present on computers or devices that are not adequately protected;
- involve the Legal Department before dealing with any legal matter of intellectual property and agreements regarding the use of NTE's intellectual property rights by third parties;
- use company assets and IT devices made available only for business purposes.

Protection of personal data

In order to pursue its activities, NTE often needs to collect and store information and personal data of its employees, customers and partners. Recognizing its importance and confidentiality when we collect, use, store and transmit this information, we commit to following all applicable policies, procedures and laws on data protection and security, as well as with those of NTE.

Our role in practice:

As NTE employees it is our job to:

- use the personal data of colleagues, customers and partners only for the business purpose for which they were collected;
- not to disclose personal information without the permission of the interested parties;
- be careful to protect personal data from unintentional disclosure, for example by leaving them easily accessible in open spaces, recorded on computers or devices that are not adequately protected;
- familiarize and comply with our Policy on cookies and protection of personal data while browsing our website visitors;
- immediately report security incidents or cyberattacks involving personal data to the IT Management.

IT security

NTE Process uses IT systems to effectively carry out its business, aware of the fact that the use of tools such as e-mail, software, applications, intranets, Internet and social media could be subject to cyberattacks and other internal and external threats.

Therefore, we use our IT assets responsibly: only for legitimate business purposes, consistently with NTE's interests and rights and in accordance with internal rules and procedures.

Our role in practice:

As NTE employees it is our job to:

- download or install software related to the workplace on NTE devices and, in case of doubt, request authorization;
- protect and not share passwords used to access company devices and tools;
- use only corporate accounts and protected devices for accessing and storing data pertaining to NTE Process;
- act with caution in case of e-mails coming from unknown addresses: do not open suspicious attachments or links;
- immediately inform the IT management in the event of a suspected cyber-attack.

External communications and use of social media

We are aware of the primary role of communication in establishing relationships of trust with its stakeholders; therefore, we base our communication through all channels, internal and external, on respect for others, transparency, and truthfulness of information.

Our role in practice:

As NTE employees it is our job to:

- speak publicly on behalf of NTE only if authorized to do so;
- before communicating, make sure that the content communicated is not confidential: the disclosure of internal materials (such as goods covered by intellectual property, trade secrets, methodologies, organization charts, strategic plans, etc.), could involve civil or criminal liability for the single worker or for the company;
- before communicating, make sure that the content cannot be perceived as discriminatory, offensive, harassing, threatening or defamatory, also taking into account the different cultural sensitivities and linguistic nuances;
- in the event of errors in the dissemination of information online, correct them promptly and transparently, by indicating that a correction has been made;

- in communication activities, in particular with the external public, the ability to act and react promptly is essential: in the event of difficulty in responding quickly, communicate to the interlocutors when it will be possible to respond with certainty and completeness.

RESPONSIBILITY TOWARDS THE COMMUNITY AND THE ENVIRONMENT

Protection of human rights

In accordance with what is stated in the Sustainability Policy, we are committed to promoting the protection and respect of human rights, making the principles and rules of conduct contained in the International Bill of Human Rights and in the conventions of the International Labour Organization our own.

Our role in practice:

As NTE employees it is our job to:

- promptly report any suspicious work practices in production sites, such as the use of underage workers, forced labour or the presence of unhealthy and unsafe places;
- before establishing a relationship with a supplier or partner, perform appropriate due diligence to ensure that they have never been involved in human rights violations, in accordance with our supplier qualification process, our Responsible Purchasing and our Supplier Code of Conduct;
- always analyse and consider within each decision-making process the potential risks to human rights that may arise from new productive investments and from the development of strategic agreements and / or commercial partnerships.

Environmental Protection

Aware of the direct and indirect impacts that our activities can cause on the environment, we are committed to disseminating the principles of environmental sustainability in our activities and in relations with stakeholders. We comply with all current regulations regarding the protection of natural capital and we aim for a continuous improvement of our environmental performance through our Environmental Management System, the definition of tangible and measurable objectives and their verification at least annually.

Our role in practice:

As NTE employees it is our job to:

- be aware of the impact that each of us has on the environment and act accordingly with responsibility and attention in the consumption of water, energy, paper and other raw materials;
- dispose of waste in compliance with company procedures, following the principles of separate collection and promoting recycling when possible;
- promptly report any risk or danger to the environment linked, by way of example, to malfunctions in production processes or deviations from the procedures defined in the Environmental Management System;
- work promptly and collaboratively, in coordination with their managers, to remedy or mitigate damage to the environment accidentally caused by our activities;
- before establishing a relationship with a supplier or partner, perform adequate due diligence to ensure compliance with environmental regulations

and the possession of an adequate Environmental Management System;

- share ideas and proposals to reduce our environmental impacts;
- promote sustainable behaviours among colleagues and business partners.

Application procedure

This Code applies to all employees and collaborators of NTE, without any exception of level or position. All NTE Departments have the duty to inform their collaborators about the content and meaning of this Code and must verify their understanding and effective compliance.

Any non-compliance could damage the reputation of the company: for this reason, we invite each employee to ask themselves about the ethics of their decisions in the workplace and to ask their manager for support in case of doubts about the integrity of their conduct.

Non-compliance or failure to report a violation can lead to equivalent disciplinary action.

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