

PROCEDURE P012 CODE OF CONDUCT

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PURPOSE

This procedure has the purpose of ensuring that all members of this company can operate with the maximum of integrity, observing current laws, creating a better future for our society and the communities in which we operate.

APPLICATION FIELD AND REFERENCES

This Code of Conduct applies to all interested parties, internal and external, involving all temporary partners and people who operate on behalf of the Company around the world.

All entities listed above represent altogether our workforce.

TERMS AND ABBREVIATIONS

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DOCUMENTS AND TOOLS

NIS Organization Model 231 (here called "Code") available upon request.

DEPARTMENTS AND ROLES

NIS S.r.l. is committed to encourage employees and workers to consider the Code a 'best practice' and to respect it and apply it to all roles/departments, clients, suppliers, consultants and agents.

ACTIVITIES AND RESPONSIBILITIES

What are my responsibilities?

Within the limits of the local legislation all NIS workforce members have to be aware that, with their behaviour, they represent the company, also after their working hours, if they act or it's intended to act on behalf of NIS S.r.l.

Their conduct affects the company external reputation and internal culture.

Our intention is to create an environment that promotes values and encourages an ethical conduct, with the aim of generating a collaborative context in which everybody's dignity is respected. We expect the compliance to every part of this Code and all in force rules and laws. All NIS S.r.l. members must treat the other people the same way they expect to be treated, including clients and other external subjects who entertain work relationships with the company.

All NIS S.r.l. suppliers and members are responsible of the company properties and assets, according with applicable principles, policies and procedures. All NIS S.r.l. members and suppliers are expected to comply with these dispositions, providing prompt, accurate and specific information.

What are basic principles of the integrity path?

The NIS S.r.l. integrity system elements are three:

Principles:

Principles are general affirmations that express NIS S.r.l. commitment to ensure the application of a correct corporate and personal behaviour.

Rules:

Rules establish the conduct guidelines, aligned with our principles. They represent a way, a tool to cope with complex situations and to obtain desired results; They're the basic rules that have to guide our daily actions. Those rules are the fundamental part of the Code.

Procedures/Codes:

When further information is needed, procedures explain in details how to act, respecting the rules.

Because of the nature of some of the NIS S.r.l. purposes, the application of more specific rules than the ones contained in this Code, it is sometimes required. In these cases, it's possible to define additional norms for selected geographical areas, business sectors or individual activities through the forms of specific Procedures or rules of other kind.

What behavior can be subject to sanctions?

We expect the best from our employees and partners, especially in terms of responsibility. Those who breach the Code and the current legislation or behave against the spirit of this Code, are subject to consequences that can also include

the potential termination of the employment contract, so the implementation of legal proceedings. Every breach of this Code will be equally and objectively judged by the relevant authorities that will apply disciplinary sanctions for each case.

For example, behaviors subject to sanctions are:

- Direct or indirect breach of the law or Code
- To be part of a violation of the law or Code
- To provide false information to the company or to hide relevant information, also during the course of an investigation
- To not adequately supervise people's conduct
- To act against the law/Code violations
- To deliberately ignore information under its own responsibility which can lead to uncover violations of the law or Code
- To not cooperate or to obstruct inspections of internal Audits, Human Resources, Legal or other institutions involved in verifying illegal or ethically incorrect behaviours
- To put in place retaliatory actions against who reported an illegal or ethically incorrect behaviour
- To formulate false illegal or ethically incorrect conduct allegations

How to measure mine and other people's behaviour

Due to the fast pace and complexity of the working environment, we can encounter situations that seem ethically incorrect. The knowledge of this Code is fundamental to guide your actions when you need to cope with these situations. Even if the Code contains a large overview of conducts and relevant examples, we may find ourselves in a concrete particular situation not mentioned in this Code or unclear. To help determine what actions are necessary, we have to ask ourselves these questions:

- Is this activity legal?
- What are the potential consequences of my actions?
- Does the activity or conduct comply with the letter or spirit of the Code?
- Is this action making me feel uncomfortable?
- Could this activity seem improper?
- How do I feel if I don't act against this behaviour?
- Is my supervisor aware of this activity and does he/she approve it?

Ethical violations are sometimes less evident than what we expect and it could result unclear how to comply with the Code in particular or unusual situations. Sometimes, even if the Code is clear, it contains provisions contrasting the culture of the geographical area in which we operate. For specific instructions on how to use the Code, you can contact the persons listed below (see Whistle Blowing Policy contacts).

WHISTLE BLOWING POLICY (Protection of illicit conduct reports authors)

On the G.U., general serie n. 269 of the 19th of November, 2018, is published the Decision 30th of October 2018: Regulation of the sanctionary power in matter of protection of the authors of wrongdoing and misconducts, of which they become aware in the work relationship context, of which the article 54-bis of the law act n. 165/2001 (c.d. whistleblowing) (Decision n. 1033)

In the event of witnessing or becoming aware of a breach of the 'Organization Model 231' or 'Code', it is fundamental to take responsibility of the matter, letting the 'Organismo di Vigilanza' know about the wrongdoing through the following methods:

- **M-182 illicit behaviours report form (Whistleblowing)**
- **Notification to the referential person through e-mail or phone**

In case this notification affect the Privacy of the Company, it is fundamental to let the Privacy Officer know about this matter, through the following methods:

- **M-182 illicit 'Whistleblowing' notification form, Rev.0 tick the 'PRIVACY' box and leave it in the dedicated company boxes**
- **Notification to the referential person through e-mail or phone**

Notifications and declarations can be made in an anonymous way; it is highly recommended to communicate name and necessary data to be contacted for more detailed information about the case. All the information and data provided will be shared with the people in charge for the investigation only. They will carry out corrective actions.

NIS S.r.l. is firmly involved in Organizational Model 231 implementation. The retaliatory actions against who, in good faith, raises a matter, won't be tolerated. It's strictly forbidden under this Code to receive retaliations, or discriminatory treatments following a notification or the participation to an inquest. Whoever exercises retaliations against those persons will be subjected to disciplinary actions that could lead to the termination of the contract. Nobody can be subject to a task change, dismissed, suspended, intimidated following a notification, in good faith, of ethically incorrect behaviours or after the participation to an investigation linked to the Code implementation.

If you believe you or somebody else you know is a potential victim of retaliations for having notified a breach or for having participate to an inquiry, we ask you to speak up. We need your participation to make sure we don't have illicit and retaliatory actions in our Company.

We remind you that our Organizational Model 231 is available upon request to the contact persons listed above.

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ONTROLS

This activity is under the Organismo di Vigilanza management

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EALTH AND SAFETY

The Health and Safety applicable instructions are the same for the Industrialization and Production, for the samples manufacturing. For the office activities, we haven't got specific guidelines.

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USTOMER SPECIFIC REQUIREMENTS

N/A

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TTACHMENTS

N/A