



Ethics

Atam has taken an **honest, honourable** and **upright** approach ever since it was founded and over time these values have helped to make it into the business that we all know today.

These crucial principles are the basis of an important document that lays down the **rules that must be followed in order to reflect the values on a daily basis** and establish a fitting reputation for the company:

- **The Code of Ethics** defines Atam's ethical responsibilities and commitments not only to clients and suppliers during business activities, but also to shareholders, employees and external staff in its in-house activities.

CODE OF ETHICS

Atam S.p.A.

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INTRODUCTION



Atam S.p.A.'s code of ethics can be considered the company's "constitutional charter". A charter of rights and duties that defines the ethical and social responsibilities of every member of the organisation. This code of ethics has been drawn up to ensure that the ethical values that inspire Atam S.p.A., and that the management believes in, are clearly defined and constitute the foundation of our corporate culture, as well as the standard of conduct for all employees and collaborators during the execution of their activities. This code of ethics has the specific purpose of promoting and ensuring fairness and loyalty in the management of transactions and human relations, both inside and outside the company. This will increase the enterprise's credibility both in Italy and abroad.

Therefore, the recipients of this code of ethics are required to comply with the values and principles herein and to protect and preserve, through their conduct, Atam S.p.A.'s image and respectability, as well as the integrity of its economic and human assets.

1. RECIPIENTS OF THE CODE OF ETHICS

1.1 This code of ethics is intended for the president, board of directors, CEO, auditors, employees, and collaborators of Atam S.p.A. (all the subjects above are hereinafter referred to as "recipients of the code"; Atam S.p.A. as "the company"; employees and collaborators collectively as "the personnel").

1.2 the recipients of the code are required to comply with the provisions herein and have them complied with.

1.3 the application of the code of ethics integrates, but does not replace, the standards in force at the time of its implementation by the board of directors.

2. GENERAL PRINCIPLES

2.1 Fairness in carrying out corporate activities.

The recipients of the code are required to comply with the laws and standards in force in Italy and in the countries in which the company operates, as well as with the code of ethics and internal regulations and circulars, including the principles established with the implementation of preventive, organisational, and system management provisions. The company will inform the recipients of the code about the content of this code of ethics and the company's internal regulations and circulars. The pursuit of the company's interest may not, under any circumstance, justify any conduct that does not comply with the applicable standards.

2.2 Conflict of interest

2.2.1 "conflict of interest" means any circumstance in which the recipient of the code, or a relative within the second degree, holds an interest that conflicts with that of the company.

2.2.2 when carrying out its activities, the company must avoid situations in which the subjects involved have a conflict of interest, even in the event of consultants and third parties.

2.2.3 recipients of the code with a conflict of interest must:

- a) promptly inform the management
- b) refrain from the corporate process where the conflict of interest occurs

2.3 Confidentiality.

The company ensures the confidentiality of the personal data it holds, which are processed in compliance with the laws in force.

2.4 Information completeness and transparency.

When carrying out their activities for the company, the recipients of the code are required to provide clear, complete, transparent, and accurate information, in compliance with the limitations set forth by the confidentiality standards contained in this code of ethics. This principle is implemented both in relations with third parties and within the company. By way of example, the recipients of the code must collaborate with loyalty with internal control officers and internal auditors (in the event that these two positions do not coincide).



2.5 Diligence in the execution of contracts.

The contracts entered into by the company and appointments must be executed on the basis of fairness, good faith, and diligence, in compliance with the contract stipulations and applicable laws.

2.6 Quality of the service.

Customer satisfaction and protection have a central role for the company. High-quality standards and technological innovation are the distinctive features of the corporate policy.

2.7 Human resource protection

The company considers its employees and collaborators as essential for success. Merit, fairness, and diligence are primary values, which inspire the company's human resource management policy to contribute to competitiveness.

2.8 Competition.

The company complies with the principles concerning competition and refrains from acts of unfair competition.

2.9 Respect and protection of the environment

The company undertakes to carry out its activities while respecting the environment as a collective asset.

3. CONDUCT OF Atam S.p.A. TOP MANAGEMENT

3.1 For the sole purposes of this code of ethics, "top management" means the president and other members of the board of directors, the CEO and members of the board of auditors. This article does not apply to company managers that are not mentioned above.

3.2 In full awareness of their responsibility, the top management:

3.2.1 Will implement and draw inspiration from the principles contained in this code of ethics and undertakes to carry out its activities and pursue the company objectives based on the values of honesty, loyalty, fairness, and integrity.

3.2.2 Will focus on results that are acceptable with customer satisfaction, in compliance with the rules, and with a just relationship with people and employees.

3.2.3 Will promote the value of teamwork in its relationship with employees and collaborators to achieve the company's goals.

3.3 In particular, the board of directors undertakes to manage the company based on the values of efficiency, competency, legality, and social responsibility. The promotion of the values that Atam S.p.A. implements with this code of ethics is an integral part of the criteria above.

3.4 The directors are required to share the strategic and operational goals of the company mission, where the various management, coordination, addressing, and control roles must be balanced.

3.5 Every member of the top management has the responsibility for paying attention to any situation of conflict of interest and incompatibility of functions, appointments, and positions, both inside and outside of the company, and act accordingly.

Moreover, the president, CEO, and every member of the board of directors and board of auditors have the specific duty to solve these situations with rigour, in order to ensure a transparent and fruitful relationship between the company and the subjects involved in its activities, institutions, and clients.

3.6 All corporate bodies are required to keep a conduct based on the following values: a) strong awareness of their role; b) honesty, integrity, and loyalty to the company; c) social responsibility.

3.7 Any conflicting position or the detection of any criticality must not affect the responsible management and harm the company's image, credibility, and position on the market.

3.8 In relations with the media, in giving interviews, statements, and in any other public intervention, the company's top management must behave on the basis of fairness and good faith. It will take care not to damage the company's image and will promote and protect the company's interests. Moreover, the top management will comply with the confidentiality obligations outlined in this code of ethics concerning the information about the company and the subjects operating in it.

4. HUMAN RESOURCES

The company is aware of the importance of human resources for the company's growth. The human capital is protected by ensuring work conditions and safety in compliance with the laws in force. The company considers it extremely important to promote the professional growth of each human resource, with particular focus on excellence, to increase its wealth of competencies.

4.1 Atam S.p.A.'s commitment to its employees and collaborators:

- a) comply with the laws in force and the provisions of the applicable collective bargaining agreements;
- b) prevent any discrimination in the selection, hiring, training, promotion, and remuneration of its employees that are not related to knowledge and merit;
- c) apply the criteria of merit, competence, dedication and any other professional criteria in making any decision concerning the relationship with its employees and external collaborators;
- d) inform employees and collaborators about the organisation and promote personnel training with targeted initiatives (method and content-wise) according the position of every employee or collaborator in the company.
- e) invest in the professional growth of employees and collaborators to create value for the company.

4.2 employees' and collaborators' commitment to Atam S.p.A.:

Preliminarily:

- a) have full knowledge and awareness of the content of this code of ethics;
- b) comply with the standards mentioned in para 2.1 related to the principle of fairness, including the provisions of law concerning workers' duties, collective bargaining agreements, internal regulations and directives.

Subsequently:

- c) keep a highly professional conduct to create value for the company;
- d) rationally use any means made available by the company for work and not for personal purposes;
- e) use the means provided by the company in compliance with their intended use, ensuring their operation and routine maintenance and preventing any damage;
- f) prevent waste of construction materials and consumables;
- g) carry out activities based on the principles of transparency, fairness, honesty, and professionalism, both within and outside the company;
- h) carry out their role responsibly, promptly, loyally, and faithfully, in compliance with the directives provided by superiors;



i) in the event of conflicting opinions, provide a brief written objection to the directive explaining the reasons why. Should the objection not be admitted, comply with the directive, except in the case of manifest illegality and conflict with the provisions of this code of ethics;

j) comply with conscientiousness, diligence and professionalism with the standards in force concerning occupational safety;

k) maintain a relationship based on civilised coexistence, loyal cooperation, and active collaboration with colleagues, with respect and discretion in personal and professional relations. On the other hand, avoid

behaviours that express any discrimination based on gender, sexual orientation, geographic origin, ethnicity, religion or political views;

m) report any violation of the law or this code of ethics to the subjects indicated herein or, in the absence of a clear indication, to the Management.

4.3 Hierarchical relationship

In the hierarchical relationship, top managers or groups (referred to as “Managers”) must carry out their activities responsibly, strengthening the employees’ sense of belonging to the company. The conduct of each Manager must comply with the values of the code of ethics and set the example for the personnel. The Managers are responsible for ensuring that the personnel gives its best at work and feels to contribute actively to the growth of the company. In addition, they are responsible for the continuous improvement of knowledge and professionalism. It is their duty to create a work environment based on transparency and equal treatment, ensuring the same growth opportunities for all resources under their direction, promoting teamwork, and supporting merit. Each Manager must pay attention to and, where possible and appropriate, implement suggestions and/or requests from employees and collaborators. The control system helps improve the efficiency of the corporate processes. Therefore, the shared goal at all levels of the organisation is to contribute to its effective operation by complying with the internal procedures to allow the identification of responsibilities.

5. EXTERNAL RELATIONS

5.1 Relations with public officials

5.1.1 For the purposes of this code of ethics, public officials means bodies, representatives, agents, members, employees, consultants, officials of public functions or surveillance bodies and services, public administrations, public institutions, national and international public bodies.

5.1.2 Relations with public officials must be based on clarity, transparency, and professionalism, on the recognition of each other’s role, and compliance with the applicable standards.

5.1.3 The recipients of the code cannot, under any circumstance promise or pay money or with other assets or grant other benefits to public officials to promote or favour the company’s interests, not even under unlawful pressure. This article applies even in the event that the money or other benefits are promised or granted to induce the public official to perform an act within with their duties.

5.1.4 Gifts to clients or other people are allowed under the condition that they comply with law, are usual (including but not limited to Christmas gifts), are appropriate, and their value does not exceed € 100.

5.1.5 In the event that a recipient of this code of ethics receives unlawful pressure from public officials for performing actions described in article 5.1.3, said recipient must report the fact in detail to the Manager, who will inform the Management.

5.2 Relations with clients

5.2.1 Atam S.p.A. considers customer satisfaction a primary objective and pursues it by providing high-quality services under competitive conditions, in compliance with standards concerning competition.

5.2.2 Atam S.p.A. ensures that its personnel applies the internal procedures for managing fair and long-lasting relations with clients.

5.2.3 as for relations with clients, both during the preparation and negotiation of the proposal and the execution of the contract, the company's personnel is required to:

- a) pursue the interest of the company with diligence and professionalism and operate in compliance with the standards in force;
- b) keep a transparent conduct based on efficiency and kindness;
- c) provide clients with truthful and accurate information;
- d) comply and have clients comply with obligations, deadlines, and commitment of each party of the contract.

5.2.4 It is expressly prohibited for the personnel of the company to accept remuneration, gifts, or favourable treatment from clients to induce them to breach this code of ethics. Each employee and collaborator are obliged to inform their superior of such offers. The Manager will promptly inform the Management.

5.2.5 The Responsible will promptly inform the Management about any breach of this article they know of.

5.3 Relations with suppliers

5.3.1 The company recognises the primary importance of suppliers for the growth of the company.

5.3.2 The company selects its suppliers based on quality, costs, punctuality, and services. The company ensures that its personnel will select suppliers in compliance with internal procedures to choose the supplier with the best performance based on the characteristics indicated in this article. These procedures ensure stable and long-lasting relations based on transparency and fairness.

5.3.3 as for relations with suppliers, both during their selection and the execution of the contract, the company's personnel is required to:

- a) pursue the goals of the company with diligence and professionalism in compliance with the standards in force;
- b) keep a transparent conduct based on efficiency and kindness;
- c) provide truthful and accurate information to allow suppliers to comply with their obligations;
- d) comply and have suppliers comply with obligations, deadlines, and commitment of each party of the contract, which must be managed pragmatically.

5.3.4 It is expressly prohibited for the personnel of the company to accept remuneration, gifts, or favourable treatment from suppliers to induce them to breach this code of ethics. Each employee and collaborator are obliged to inform their superior of such offers. The Manager will promptly inform an internal control officer.

5.3.5 The Manager will promptly inform the Manager about any breach of this article they know of.

5.4 Relations with consortium partners

Relations with consortium and joint venture partners are governed by the same principles as relations with suppliers.

5.5 Relations with representatives of political parties and interest groups

5.5.1 Representatives of political parties means natural persons who have who hold institutional positions within political parties and movements.

5.5.2 Representatives of interest groups means natural persons who have who hold institutional positions within organisations, such as trade associations, unions, and environmental organisations.

5.5.3 The funding of political parties is permitted only prior resolution of the board of directors and only within the limits and in the forms provided by the standards in force.

5.5.4 The company cannot, under any circumstance, finance trade unions.

5.5.5 Forms of strictly institutional collaboration are permitted to contribute to events and activities, such as studies, research, conferences, and seminars.

5.5.6 Charity, even in the form of community relations, must comply with the applicable standards and with transparency and reasonableness criteria. Unless it falls within the competencies of the corporate functions, it must be approved by the board of directors.

6. CONFIDENTIALITY

6.1 Confidential information

6.1.1 Information concerning the company, including but not limited to the knowledge of projects, proposals, negotiations, company development strategies, occurrences (even future and uncertain ones) concerning the company's activities, as well as the data concerning the personnel (all of which are hereinafter referred to as "confidential information") are confidential.

6.1.2 The recipients of the code are required:

- a) not to disclose confidential information unless required for performing tasks for the company, notwithstanding the fact that confidentiality obligations remain even after the termination of the employment contract;
- b) to consult only the documents they are authorised to access, in compliance with their duties, and to allow access only to those entitled;
- c) to comply with the applicable laws;

The following is not considered confidential information:

- i) information within the public domain, including but not limited to institutional information or information contained in published balance sheets. However, the company's accounting data are considered confidential information until they become publicly available following the communication of the top management. Notwithstanding all of the above, the recipient of the code who culpably or maliciously makes confidential information publicly available will respond to the company pursuant to this code of ethics.
- ii) information whose dissemination is permitted or imposed by law.
- iii) information whose dissemination is authorised by the board of directors or the president.

6.1.3 information concerning third parties who come into contact with the company for negotiations, correspondence, business deals, and other activities of the company is considered confidential information pursuant to the provisions of article 6.1.2. Therefore, this information cannot be disclosed, except for the cases specified under section i), ii), and iii) of article 6.1.2, or in the event that the third parties, being entitled to do so, authorise the disclosure of confidential information that concern them in writing or other legal forms. By way of example, third parties may authorise the citation of data concerning the project, including the name of the client in a specific contract clause.

6.1.4 Without prejudice to the above:

- a) the recipients of the code must comply with diligence and professionalism with the provisions of law concerning insider trading and market abuse.
- b) the disclosure of confidential information to third parties for facilitating their investments in the stock market is not permitted.

6.2 Privacy protection

Atam S.p.A. ensures the protection of the personal data of every employee and collaborator. Employees must not provide personal information other than that required by the applicable laws.

6.3 Duration of confidentiality obligations

The confidentiality obligations outlined in this code of ethics remain even after the termination of the subordinate labour or collaboration relationship with the company.

7. ENVIRONMENT PROTECTION AND OCCUPATIONAL SAFETY

7.1 In carrying out its activities, Atam S.p.A. strives for excellence in the protection of the environment and safety of its personnel and third parties. To achieve this goal, the company:

- a) undertakes to comply with the standards in force concerning the environment and occupational safety;
- b) establishes and provides guidelines to implement environment and safety protection policies, which must be complied with by the company;
- c) promotes the participation of employees in risk prevention, environment protection, and health and safety protection processes concerning them, their colleagues, and third parties.

7.2 to implement the environmental and occupational safety policies, the company:

- a) takes all the internal control measures concerning environment protection, prevention of accidents and of occupational diseases;
- b) trains the personnel and raises their awareness of such matters;
- c) considers environmental and occupational safety certifications an essential criterion in the selection of suppliers.

8. MANDATORY NATURE OF THE CODE AND PENALTIES

8.1 Compliance with this code of ethics is an essential part of the employees' contractual obligations pursuant to and for the purposes of articles 2104 and 2105 of the Italian civil code and is considered disciplinarily relevant.

8.2 Collaboration contracts include the obligation of compliance with this code of ethics.

8.3 The personnel's non-compliance with the provisions of the code of ethics may constitute a breach of the primary obligations of the subordinate labour or collaboration relationship, or a disciplinary offence, pursuant to the procedures established by the national collective bargaining agreement and article 7 of the workers' statute (if and where applicable), with all the legal consequences, even with respect to maintaining the subordinate labour or collaboration relationship. Moreover, it can lead to demands for compensation.