



**Kyma Srl**

## Code of Business Ethics and Conduct

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## 1. Premise

All Kyma's activities are characterized by compliance with the law and international conventions, such as the 1997 OECD convention (Organisation for Economic Co-operation and Development) against corruption in business, and by strict respect for the human rights enshrined in the UN Universal Declaration. Kyma operates in accordance with fair competition, with honesty, integrity, fairness and good faith, respecting the legitimate interests of members, employees, customers, business and financial partners, and the local community in which it operates its business.

Those working or collaborating with Kyma are committed to observe and to enforce these principles within their functions and responsibilities, without distinction or exception. The adoption of behaviour in contrast with these principles cannot be justified by the conviction of acting in the interests or to the advantage of Kyma.

Despite its limited business size, Kyma operates in a complex context, in consideration of its nature and private appearance and the corresponding operational tools that it must use, in harmony however with the public control that characterizes it. Due consideration must be given to the obligations to which the company is bound in the light of the existing regulatory framework, with particular reference to Law 190/2012 and implementing decrees, notably Legislative Decree No. 33/2013. Implications regarding administrative liability of Institutions pursuant to Legislative Decree no. 231/2001 for crimes committed in the interests or to the advantage of themselves should not go unspoken. For these reasons it is important to clearly state the set of values that Kyma recognizes, accepts and shares and all the responsibilities it assumes towards the inside and the outside.

This Code of Business Ethics and Conduct ("Code") is drafted following these premises. Its observance by all those working in the company is of fundamental importance for the good functioning, reliability and reputation of the Institution, all factors which constitute a decisive asset for the success of the company.

The employees of Kyma must fulfill the general duties of loyalty, fairness, and those constitutional of diligence, loyalty, impartiality and good conduct, and must execute their employment contract in good faith, while refraining from carrying out activities in competition with the company. They must also respect company rules and comply with the precepts of this Code.

Any relationships between employees must be inspired by transparency, fairness, loyalty and mutual respect. Administrators along with all those who work in the company are required to know the Code, to concretely contribute to its implementation and to report any shortcoming and non-compliance. Kyma is committed to facilitating and promoting the knowledge of the Code for its employees so that they can make a constructive contribution to its contents.

Any behavior contrary to the letter and to the spirit of the Code will be sanctioned as referred on the Code itself. The principles outlined in the Code can be supported by specific directives, regulations or internal procedures (hereinafter also "Procedures"), aimed at making the application more concrete and punctual. The Code is brought to the attention of all those with whom Kyma maintains business relations. In harmony with Legislative Decree no. 231/2001, this Code is part of the more general disciplinary and penalty system concerning the relationship between employer and employee, as regulated by current legislation and by the National Collective Labour Agreement of the Metalworking Industry. The Code therefore formalises and also constitutes the

Disciplinary System referred to in the Model of Organization and Management of Kyma, as required by art. 6 paragraph 2 letter e) of Decree Law 231/2001 (Model of Organization, Management and Control, Decree Law no. 231/2001, hereinafter also called "Model"), in order to ensure the its respect and of compliance with procedures provided by it, and to discourage and prevent crimes pursuant to art. 231/2001 as well as any case of unlawful conduct, and ensuring strangeness of the Company from illegal and improper practices.

Kyma will monitor compliance with the Code, preparing appropriate information, prevention and control tools and ensuring the transparency of operations and behaviors.

The Administrative Body and the company management are responsible for the verification of the implementation of the Code of Ethics and its application; they may also promote integrations or modifications of its contents. The social inclusion of Kyma on the territory makes every useful contribution from its stakeholders desirable.

## 2. Compliance with laws, rules, regulations and this Code of Conduct

**Kyma complies with the laws and regulations in force in each country or context in which it operates, consistent with the principles, objectives and commitments set forth in this Code.**

The Administrative Body and all those who work in the company must adapt their actions and behaviours to the principles, objectives and commitments required by the Code and to the Constitutional values that shape the exercise of activities of public interest, with all due respect to the law.

When setting the company objectives, the members of the Administrative Body are to be inspired by the principles of the Code. Depending on the role, the staff is required to observe the contents of the Code when proposing and implementing the projects, actions and investments useful to increase the assets, management and technology of the company, as well as long-term wellbeing of all stakeholders. All actions, operations and negotiations undertaken, and the general conduct adopted by employees in the performance of their working activities shall conform to the highest degree of fairness, thoroughness and transparency of information, to both formal and substantial aspects of legitimacy as well as to the clearness and truthfulness in accounting examinations in compliance with rules, regulations and internal procedures in force. Compliance with the rules of the Code must be considered an essential part of the contractual obligations of all employees, according to and for the purposes of the law. Kyma shall cooperate actively and wholly with the Authorities through its employees.

External collaborators (including consultants, representatives, intermediaries, agents, etc.) and all those with whom Kyma maintains business relationships are asked to comply with the same principles expressed in the Code. Contracts and any act of entrustment and conferral of assignment, consultancy or collaboration must refer to the content of this Code; employees violation constitutes disciplinary responsibility ascertained upon the outcome of the related procedure and in compliance with the principles of graduality and proportionality of sanctions. Serious violation by other categories indicated above is the cause of termination or forfeiture of the relationship, as indicated in specific provisions or clauses. Furthermore, the Contractor is obliged

to include the same clauses to the Subcontractor and to their employees and collaborators engaged in the services of the subcontracting contracts. Serious violations are those that impose expulsion penalties for employees.

All those working in Kyma are therefore committed to:

- collaborate diligently, observing the requirements of this Code, the determinations made by the Administrative Body of Kyma for the exercise of the institutional duties and for the discipline of work, also in relation to the modern regulations concerning health, respect for environment and safety in the workplace;
- respect this Code, the Organization, Management and Control Model pursuant to Legislative Decree no. 231/2001 and the system of internal quality procedures of the Company;
- comply with and fulfil the transparency obligations established by Legislative Decree 14/03/2013, n. 33 as subsequently amended and supplemented;
- act independently and impartially, abstaining in the event of a conflict of interest;
- not use available information for private purposes;
- avoid situations and behaviours that could hamper the proper fulfilment of assignments or harm the interests or image of Kyma and exercise eventually conferred prerogatives and powers for the purposes of general interest for which they have been conferred;
- exercise the tasks assigned by acting with maximum cost-effectiveness, efficiency and effectiveness.

In their relations with the recipients of their action, they commit to:

- ensure equality of opportunities and equal treatment by refraining from arbitrary actions that have negative effects on the recipients or lead to discrimination based on sex, nationality, ethnic origin, genetic characteristics, language, religion or faith, personal or political beliefs, belonging to a national minority, disability, social or health conditions, age and sexual orientation or other factors;
- show the utmost availability and cooperation in dealing with public administrations;
- demonstrate the utmost commitment, availability and collaboration in relations with clients of Kyma, in the context of the relationships established by Kyma through specific agreements, conventions and collaborations

### 3. Business and commercial relations

**All actions and activities carried out or implemented by Kyma must be legitimate, open to verification, respectful of established rules, procedures and regulations, and based on correct and comprehensive information. The company acts according to ethical and legal standards during commercial, promotional and industrial relations.**

Kyma is inspired by the principles of loyalty, fairness, transparency, efficiency and openness to the market, and operates in compliance with the international conventions that regulate the performance, countering any possible form of crime that may affect fair competition. For this purpose, all those working with the Company as well as external associates whose actions may in any way be connected to Kyma, shall always adopt appropriate conduct in all businesses relevant

to the Company and in the relationship with the Public Administration. Corrupt practices, illegal favors, collusive conduct, and requests (either direct or through third parties) of personal or career-related advantages for oneself or others are strictly forbidden.

#### 4. Relations with suppliers and clients. Conduct in service

**Kyma pursues a correct and transparent relationship with customers and suppliers through the offer of competitive products and in compliance with the rules of fair competition. The selection of suppliers and the determination of purchasing conditions must be based on an objective assessment of the quality, price and ability to supply and guarantee satisfactory services.**

In terms of contracts, procurements and, in general, supply of goods and / or services, employees are obliged to:

- observe internal procedures to select and manage relations with suppliers;
- not preclude any supplying company in possession of the required qualification the possibility of competing to win a supply, adopting objective evaluation criteria in the selection, according to codified and transparent procedures;
- obtain the collaboration of suppliers while constantly ensuring that the needs of the customers of Kyma are met in terms of quality, cost and delivery times, so that to be at least equal to their expectations;
- use products and services provided by parent/controlled companies or Institutes at competitive conditions to the greatest possible extent , in compliance with the law;
- observe the established contractual conditions;
- maintain a frank and open dialogue with suppliers, in line with good commercial practices;
- notify relevant branches of the enterprise, and even parent and controlled companies or Institutes, in case of serious problems with a supplier, in order to create the possibility of evaluating the consequences at a Group level.

The behavior of the employee, particularly in relations with customers and suppliers, is based on the following principles:

- spirit of service, correctness, courtesy and availability;
- completeness and accuracy in answering to correspondence, telephone calls and e-mail messages;
- deflection of the interested party to the competent office of Kyma, if the employee is not capable by position or by subject;
- without prejudice to the rules on professional secrecy, they guarantee to respond to requests regarding their behaviour and that of other employees under their responsibility or coordination, without undertaking commitments or anticipating the outcome of their own decisions or actions, or that of someone else in the office, except for the authorized cases.

The staff also commit to:

- adopt behaviors of mutual respect and collaboration within the company spaces and always towards colleagues, staving off attitudes that may disturb the necessary serene environment;



- ensure the exchange of information and make their expertise available in case of assignment to another task;
- albeit respecting the procedural deadlines, not to delay or to adopt any conduct that would cause other employees to perform activities or to adopt decisions ascribed to them, unless under justified reasons.
- not to delay or adopt any conduct that would cause other employees to perform activities or to adopt decisions in their place, unless there is a justified reason and while respecting the procedural deadlines.

## 5. Assets owned by the company

**Each employee is required to conserve and protect the assets and resources that the company has entrusted them for their duties.**

Employees can not misuse company assets and resources or allow others to do so. The usage of IT tools is reserved for work purposes and is governed by the operating regulations by Kyma, also in order to avoid possible damages or alterations to data and / or programs resident in computer systems owned by third parties, private and public.

When an employee leaves the Company for any reason, retirement included, all items belonging to the Company shall be returned, including documents and data processing supports containing information belonging solely to the Company. Confidential information shall not be disclosed neither its improper use shall be allowed. Developments considered “intellectual property” carried out by an employee during the working relationship shall be considered Company property upon departure of the employee from the Company.

## 6. Human resources, security and environment

**Kyma is committed to ensuring the professionalism of its employees as well as the safety and health of its workers, external collaborators, customers and communities affected by the Company activities and to reducing the environmental impact.**

The company policy aims to develop and maintain the skills and competences of each employee, acknowledge the merits, promote equal opportunities and safeguard the provisions of the United Nations Universal Declaration of Human Rights. The process of selection, recruitment and career progression of personnel is characterized by transparency and is carried out according to company rules that guarantee objectivity and traceability, in compliance with the constitutional principles of good performance and impartiality, as well as those community principles of equal treatment, non-discrimination, proportionality and transparency. The industrial activities of Kyma shall be managed in full compliance with current legislation on environmental conservation, and prevention and protection against the risk of accidents at work. In this case, operation management must refer to advanced criteria for environmental protection and energy efficiency, pursuing the improvement of health and safety conditions.

Research and technological innovation must be dedicated to the promotion of products and processes that are increasingly compatible with the environment and characterized by an enhanced focus on the safety and health of operators. Employees participate in the process of risk prevention, environmental conservation and safeguard of health and safety towards themselves,

their colleagues and third parties, as part of their duties and responsibilities. For this purpose, the company promotes and organizes training and updating activities for all of its employees.

## 7. Accuracy and verification in the accounts and entries

**The financial, accounting and management evidences of Kyma must be based on precise, exhaustive, verifiable, consistent with the hierarchical and organizational structure of the company information .**

Every entry in accounting books and documents shall reflect the nature of the operation in question and shall be based upon suitable documentation so that all accounts and documents may be open to objective analysis and verification.

The flow of information, in particular for the drafting of accounting documents and communications required by law, must be carried out in accordance with the principles of truthfulness, correctness and transparency.

Kyma promotes and spreads a culture characterized by the awareness of inspections and a control oriented mentality aimed at preventing corporate crimes. The attitude towards controls must be positive, for the contribution that these give to the improvement of the business efficiency.

The responsibility for implementing an effective internal control system shall be common to every level of the organizational structure and the corporate bodies; hence directors, statutory auditors and employees are required as their duties to participate to the company control system and to involve their collaborators. All employees are responsible for the definition and correct functioning of the control system as part of their roles. Anyone who becomes aware of possible omissions, falsifications, irregularities in the accounts and in basic documentation is required to write a report to their superior or to the competent corporate bodies.

Statutory auditors, auditors, internal auditors, if established, and the supervisory body shall have free access to any data, documentation and information they require to perform their tasks.

## 8. Loyalty and conflict of interests. Abstention obligation

**Kyma shall maintain a relationship of trust and loyalty with each of its employees. They must be loyal and fair, pursuing the interests and objectives of the Company. Employees shall avoid any situation or activity that may cause conflict of interests or that may interfere with their ability to make impartial decisions, in the best interest of the Company**

A relationship of full trust exists between Kyma and its employees, for which it is the primary duty of the employee to use the assets of the company and their work skills for the realization of the corporate interest.

In this framework, managers and employees must avoid any situation and activity that might create a conflict with the interests of the Company or that might interfere with their ability to make impartial decisions in the best interests of the Company and in full compliance with the rules and regulations of this Code. Any situation that may constitute or determine a conflict of interest must be promptly communicated so that its existence and seriousness can be assessed by their superior or by the corporate body appointed for this purpose. The employee in this situation is bound to abstention.

The following situations show non-exhaustive examples of conflicts of interest:





- economic and financial interests of the employee and / or their family in the activities of suppliers, customers and competitors
- using their position in the company or the information acquired in their work in a manner which could generate conflict between their personal and business interests;
- carrying out work activities of any kind with customers, suppliers or competitors;
- acceptance of money, favours or benefits from people or companies that are or intend to initiate business relationships with Kyma or the companies or Institutions of the Group.

For this reasons employees of Kyma and people that fall into the other categories indicated in art. 2 commit to:

- refrain from making decisions or perform activities related to their duties in situations of even potential conflict of interests for them, their spouses, cohabitants, first or second degree relatives or similar. The conflict may concern interests of any kind, even non-patrimonial, such as those deriving from the intention of wanting to indulge political, trade union or hierarchical pressures;
- abstain from participating in decisions or activities that may implicate their own interests, or that of their first or second degree relatives, spouse or cohabitants, or anyone with whom they have regular contacts, namely people or Organizations with which they or their spouse have a pending or serious enmity or significant credits or debits, people or organizations of which they are a guardian, trustee, procurator or agent Institutions, associations (even not recognized), committees, companies or establishments of which they are an administrator, executive or manager; refrain from any other case which would represent serious reasons of expediency.

The wish to abstain and the related reasons must be communicated to the Administrative Body of Kyma which keeps them in the appropriate Archives.

## 9. Gifts, compensations and other utilities

**It is not permitted to pay or offer both direct or indirect disbursement and material benefits of any entity to third parties, public officials or individuals, aiming to influence or compensate any act from their office.** Any employee who receives gifts, preferential treatment or other benefits, also relating to relationships with higher-ups or subjects not directly attributable to normal courtesy, must reject them, immediately informing their superior. In particular, employees of Kyma and people that fall into the other categories indicated in art. 2, commit to:

- not ask or solicit gifts or other benefits for themselves or for others; nor to accept gifts or other benefits for themselves or for others, except for those of modest value occasionally offered within social courtesy;
- not ask for gifts or other benefits, even of modest value, for themselves or for others from people who can benefit from decisions or activities inherent the office as consideration for accomplishing or for having performed any act of their office, nor from people against which they are or are about to be asked to perform or exercise their duties or powers related to the office, regardless of the fact that their action constitutes a crime or not;



- not accept direct or indirect gifts or other benefits for themselves or for others from their own subordinates, except for those of modest value used occasionally in the context of common courtesy or international customs;
- not offer direct or indirect gifts or other benefits to their higher-ups, except for those of modest value used occasionally in the context of common courtesy or international customs;
- not accept collaborations from private parties who have or have had a significant economic interest in decisions or activities related to any institutional activity by Kyma in the previous two years.

For the purposes of this article we intend as "of modest value" gifts or other utilities, also in the form of discount, worth no more than € 150 (one hundred and fifty / 00 euros) over a one-year period.

If the gifts exceeding the limit referred to in the first paragraph are delivered directly to Kyma and the employee does not have the opportunity to refuse them upon delivery, they must inform the Board of Administration, which will return them to the donor through postal service. The restitution shall be accompanied by a letter of similar content to the following, signed by the Corruption Prevention and Transparency Manager or, if not designated or absent, by the legal representative of Kyma: "Dear / Dr ..., the employees and collaborators of Kyma srl are subject to the application of a code of business ethics and conduct that prohibits the acceptance of gifts that exceed a certain value over a one year period, among other things. If delivered, they must be returned. We therefore provide for the restitution. ... "

## 10. Confidential information

**Information that should not be disclosed, relating to knowledge or data belonging to the company, must not be used, communicated or disclosed without the specific authorization of the persons responsible for such information, knowledge or data .**

Examples of confidential information include all details learned while performing work activities, or activities whose disclosure and use may cause harm or damage to the company and / or an undue gain for the employee. Information, intelligence and data acquired or processed by employees during their work or tasks shall belong to the Company and shall not be used, communicated or disclosed without the specific authorization of superiors.

Kyma undertakes to protect information relevant to its own employees and third parties, deriving or acquired during business relations, and to avoid any improper use of this information.

Furthermore, the employee:

- refrains from providing information and intel relating to administrative actions or operations, or information pertaining to technical sales, in progress or concluded, in the cases provided for by the law and regulatory for the rules on access;
- refrains from releasing copies and extracts of records or documents according to their competence, in the manners established by the rules on access and by the Procedures and / or deliberative acts of Kyma;



- commits to observe the official secrecy and the legislation on the protection and processing of personal data and to inform the applicant of the reasons which prevent acceptance when asked to provide non-accessible information, acts, documents protected by professional secrecy or by the provisions concerning personal data. In the processing of personal data, the subjects are required to comply with the Code follows EU Regulation 679/2016 and, where applicable, of Legislative Decree 196/2013;
- forwards any request for which they are not competent to the responsible office or branch of Kyma, according to the internal arrangements.

## **11. Relations with public officials, with national, EU and foreign public institutions and with other subjects representing collective interests.**

**Contact with public officers or government organizations, public administration and Italian, European or other foreign public institutions, are limited to those who, specifically authorized, are entrusted with developing or having contact with such administrations, public officers, organizations and/or institutions**

The personnel commits to not provide false declarations that are liable to mislead or alter the analytical capacity of the Public Administration, especially if these artifices are connected to inspections by the Public Authority or for the purpose of acquiring public funds. In cases where funding has been obtained from public entities, it is mandatory to allocate the funds for the exact purposes for which they have been requested and obtained. Gifts and complimentary acts of courtesy or hospitality in favor of governmental representatives, public officers and public employees may only be permitted when these prove to be of reasonable value and, as such, do not compromise the integrity or reputation of one of the parties concerned and could not be interpreted by an impartial observer as aimed at securing advantages in an improper form. In any case, this type of expense must be authorized at an adequate level and properly documented.

## **12. Relations with political and trade union organizations. Relationships with Associates**

**Kyma regulates relations with political and trade union organizations exclusively on the basis of current laws, regulations and agreements or contracts, guaranteeing the highest standards of transparency and fairness.**

Kyma shall not make any kind of contribution, direct or indirect, in any form whatsoever, to political parties, movements, associations, committees, political organizations and trade unions, to their representatives and candidates, with the exception of those due, or rather allowed, on the basis of specific provisions of the law. Certain initiatives can be excluded from this field – in respect of the laws in force and with prior authorization at an adequate level – whether strictly related to Company mission or social solidarity. Activities performed by an employee during working hours in favor of political organizations or trade unions shall be equivalent to a form of contribution in favor of the same. Therefore, in the event that an employee were candidate to public positions or covers a public position or participates in an electoral campaign of a candidate, they cannot be salaried for the period of time devoted to such activities, with the exception of cases explicitly provided for by law. When opinions on public matters are expressed, they must be made on personal account, without ever giving the impression of speaking or acting on behalf of the Company. Only those who

have legal representation or have been formally authorized can express opinions in the name or on behalf of the Company, but limited to issues pertaining to it and/or to its business units. This is without prejudice to the right to express assessments and disseminate information to protect trade union rights.

Kyma aims to maximize the value of the company for its members.

Therefore Kyma guarantees equal treatment to all members, with whom it establishes a continuous and transparent dialogue, in full compliance with current legislation, with particular regard to all employees and collaborators, as well as to the Administrative Body.

### 13. Relations with the press and the media

#### Information to the public shall be truthful and transparent.

The Group shall present itself in an accurate, coordinated and consistent way when dealing with the press and mass media. All contact with the press or the media shall be made by those specifically authorized to do so, to ensure the protection of the Group. Any request for news by the press or the media must be notified to the Company department in charge before any commitment is undertaken to respond to such a request.

### 14. Effects of violations

#### Any violation of this Code of Conduct shall jeopardize the trust-based relationship between the Company and employee.

Any violation of the Code of Conduct by directors, statutory auditors and employees could lead to penalties provided for in the Company disciplinary system: revocation of powers or functions, dismissal, reference to the administrative or judicial authorities.

Violation of the principles contained in this Code by any third party with whom Kyma has commercial relations could cause the termination of the contract

The limits related to the sanctioning power imposed by the legislation on disciplinary measures in the metalworking sector shall be respected, with particular regard to the applicable sanctions and the form of exercise of such power.

Failure by the employees to comply with and / or violation of the provisions of this Code, of Model 231 and of Procedures constitutes non-fulfillment of the obligations arising from the employment relationship as well as disciplinary offense.

With reference to the applicable sanctions, it should be noted that they will be adopted and applied in full compliance with the procedures provided for by the collective national and company regulations applicable to the employment relationship.

Unless the violation also gives rise to criminal, civil, administrative or accounting responsibility by the public official, it shall lead to disciplinary responsibility ascertained upon the outcome of the disciplinary procedure, in compliance with the principles of graduality and proportionality of the sanctions.

Violations to the norms of the collective agreement and of the present code can be punished, according to the seriousness of the infractions, in the following measures:

- 1) verbal recall;
- 2) written warning;
- 3) fine;



- 4) suspension;
- 5) dismissal.

Any violation is assessed in each individual case with regard to the severity of the behaviour and the extent of the injury, including moral, inflicted to the decorum or prestige of Kyma for the purposes of determining the type and extent of the disciplinary sanction concretely applicable.

Dismissal without prior notice shall remain valid for the cases already provided for by the law, by the collective agreement and by the Disciplinary Code when in force.

Free-lancers and collaborators of the Company, even free of charge, should follow the Model, this Code and / or of the Procedures; any violations or circumvention represent a serious breach of contract performance. Therefore, the termination of the contract for non-compliance follows the provisions of article 1453 et seq. of the civil code. Consequently, all relations with these subjects must provide specific cancellation clauses regarding supply and collaboration agreements, as well as clauses for compensation for damages and indemnities.

In case of offense or violation of this Code, of the Code of Ethics, of the Model (once adopted) and / or of the Procedures by members of the Administrative or of the supervisory and audit Bodies of the Company, employees shall notify the entire Administrative Body and the supervisory and auditing bodies of the Company, which will take appropriate action based on the seriousness of the incident. The Company will act for compensation should it be appropriate.

## 15. Relevant Offices

A correct and effective application of the code of conduct is only possible through the commitment and competition of the entire Kyma organization, so that every single company action shall turn out to be consistent with the ethical principles of the code itself, also given the prospect of cooperation with the institutes responsible for the process of implementation and control, i.e. with:

- the Administrative Body;
- the Corruption Prevention and Transparency Manager;
- the 231 Supervisory Body.

In terms of ethics and correct behaviour within the company, the Administrative Body of Kyma:

- receives every year an update regarding the three-year plan for the prevention of corruption within the period established by law from the Head of Corruption Prevention and Transparency, in order to be able to adopt it within the scheduled time frame, and an annual report; these documents, as a whole, will contain information on the effectiveness, adequacy and status of implementation and compliance with actions to prevent corruption, transparency actions and, more generally, adequate proposals for revision, integration and modification, also aimed at reducing the risk that crimes pursuant to Legislative Decree 231/2001 occur within Kyma;
- receives reports of possible violations of the code of conduct from the Corruption Prevention and Transparency Officer, together with a half-yearly recapitulative report;
- makes decisions on each of the previous points;



- makes decisions on each of the previous points;
- ensures that the reporting is safeguarded from any form of retaliation and that it benefits from the protections pursuant to art. 54-bis of Legislative Decree 165/2001 and of art. 6 of Legislative Decree 231/2001, as well as the confidentiality of their identity, without prejudice to legal obligations.

The Corruption Prevention and Transparency Manager designated by the Administrative Body is responsible for proposing the annual update of the Three-year Corruption Prevention Plan, to instruct and implement the supervisory and control program and to inform the Administrative Body on their activity.

The Corruption Prevention and Transparency Manager shall:

- inform the Administrative Body about the state of application of the code of conduct;
- verify the level of application of the code of conduct through adequate monitoring activities;
- propose periodic review of the code of conduct;
- receive reports of violations of the code of conduct and inform the Administrative Body;
- promote an adequate training of personnel.

All Interested parties are required and encouraged to report to the Corruption Prevention and Transparency Manager, in writing and in a non-anonymous form, any violation or suspected violation of the code of conduct .The Manager shall analyze the report and communicate it to the Administrative Body (in order to ensure the confidentiality of the identity of the reporting party, without prejudice to the legal obligations).

The Corruption Prevention and Transparency Officer, together with the Supervisory Body, indicates the violations which emerged from the reports of the Interested parties or from the monitoring activity, together with the suggestions deemed necessary to the Administrative Body , which, following an appropriate analysis and possibly listening to the parties involved in the alleged violation, communicates the decided measures through the Chairman to the competent corporate departments; the latter shall take care of the implementation and report the outcome to the Corruption Prevention and Transparency Officer.

Reports can also be sent via e-mail to:

**[rpct@kyma-undulators.eu](mailto:rpct@kyma-undulators.eu)**

## 16. Final dispositions and validity of the Code

The provisions laid down by the decree of the President of the Republic n. 62/2013 will apply for anything not referred for in this code of ethics and conduct

This Code is in force from the date of approval by the Administrative Body of Kyma, which took place on the 8<sup>th</sup> of March 2019, Report no. 66.

